EPA Reg. No. 88544-2

Material Sent for Data Extraction

Reg #88544-2
Reg # 88544-2 Description: 2 Amendment
Material(s) Sent to Data Extraction Contractors: ☐ New Stamped Label Dated ☐ Notification Dated ☐ New CSF(s) Dated
Other
7 Decision #471306 472656
Other Action/Comments: Please scan clipped items — Thank you!
Reviewer: Gene Benbow
Phone: 347-0235 Division: RD - IRB Date: $l - 9 - /3$



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL, SAFETY AND POLLUTION PREVENTION

JAN - 4 2013

Willowood Imidacloprid LLC c/o Cheryl Wagner Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707

Subject: Amendment to add structural pest control use to the label

EPA Registration No.: 88544-2

Primary Brand Name: Willowood Imidacloprid Technical

Submission Date: November 26, 2012

Dear Ms. Wagner:

The label referred to above, submitted under FIFRA, as amended, is <u>acceptable</u>. Please submit one final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions, please contact Gene Benbow at (703) 347-0235 or via email at <u>benbow.gene@epa.gov</u>.

Sincerely

Venus Eagle

Product Manager 01

Insecticide-Rodenticide Branch Registration Division (7505P)

Willowood Imidacloprid Technical For Use in the Manufacture of Insecticides

Active ingredient:	
Imidacloprid 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	97.7%
Other Ingredients:	2.3%
Total:	100.0%

KEEP OUT OF REACH OF CHILDREN WARNING

	First Aid
IF SWALLOWED	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If INHALED	 Move person to fresh air. If person is not breathing, call 911 or an ambulance then give artificial respiration preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
Note	to Physician: No specific antidote is available. Treat symptomatically.
treatment. EMERGENCY NUME	iner or label with you when calling a poison control center or doctor, or going for BERS Emergency Assistance (Human or Animal), Call 1-800-222-1222.

For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call ChemTrec at 1-800-424-9300.

EPA Reg. No. 88544-2 EPA Est. No. Net Contents: _____Pounds

Manufactured for: Willowood Imidacloprid LLC 1600 NW Garden Valley Blvd, Suite 120 Roseburg, OR 97471

JAN -4 2013

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as arranded, for the pesticide Registered under EPA Reg. No. 58544-2

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Warning. May be fatal if swallowed. Harmful if inhaled. Avoid breathing spray mist or vapor. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves made out of any waterproof material. Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharged Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Willowood Imidacloprid Technical is intended for formulation into end use products for:

- Terrestrial Non-food Crop, Residential and Commercial Outdoor: Lawns, turf grasses, ornamentals, Christmas Trees, Poplar/cottonwood trees
- 2. Terrestrial Non-food Crop, Indoor: Poultry facilities
- 3. Terrestrial Food Crops: Bananas and Plantains, Bulb Vegetables Crop Group, Bushberry Crop Group, Brassica (Cole) Vegetable Crop Group, Caneberry, Canola, Cereal Grain Crop Group (Barley, Oat, Rye, Sorghum, wheat (excluding rice), Citrus Crop Group (containerized and field), Coffee, Corm Vegetable Group, Cotton, Cranberry, Cucurbit Vegetables Crop Group, Fruiting Vegetables Crop Group, Globe Artichoke, Grapes, Greenhouse Vegetables, Herb Crop Group, Hops, Leafy Vegetables Crop Subgroup, Leafy Petiole Vegetables Crop Subgroup, Legume Vegetables Crop Group (except soybean), Peanuts, Pome Fruit Crop Group, Pomegranate, Potatoes (including seed piece treatment), Root and Tuber Vegetables Crop Group, Soybeans, Sugarbeets, Strawberry, Stone Fruit Crop Group, Tobacco, Tree Nut Crop Group (excluding almonds), and Tropical Fruit (Acerola, Atemoya, Avocado, Black sapote, Camstel, Chenmoya, Custard apple, Feijoa, Jaboticaba, Guava, Llama, Longan, Lychee, Mamey sapote, Mango, Papaya, Passionfruit, Persimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Waxjambu).
- 4. Greenhouse Non-food Crop, Residential and Commercial Indoor: Greenhouse Ornamentals, Interior Plantscapes
- 5. Indoor Non-food Use: Woods, Plastic and Textiles, above and below ground protection of wood, wood composites, plastics, cables, textiles, geotextiles, and termiticidal wall treatment from insect infestation.

Preservatives for Wood and Wood-based Composite Products: For indoor manufacturing of wood preservatives or preservatives intended for use in wood-based composite products, such as waferboard, fiberboard, particleboard, plywood, and oriented strand board when it is important to prevent the attack of insects, including termites.

Preservatives for Plastic: For indoor manufacturing of preservatives intended for use in plastics such as PVC, polyurethane, polyethylene, polypropylene, natural synthetic rubber, and other plastics. These plastics are used in the following applications: boat covers, carpet backings, convertible car tops, flooring, hoses, automotive underbody coatings, pond liners, roofing foils, wall coverings, cable sheeting, film and sheet of agricultural products, and other applications. Use for film and sheeting, extruded profiles, plastisols, molded goods, organosols, fabric coatings, and similar systems requiring termiticidal compounds.

Textiles: For use as a termiticides in textiles such as tents and groundsheets, boat and car covers, awnings, tarpaulins, marine upholstery, seals, felts, and other applications. Formulations must be manufactured indoors.

Detailed information on chemical and physical properties and other formulating specifications for Willowood Imidacloprid Technical are available upon request from Willowood Imidacloprid LLC. Obtain and read this information before undertaking the formulation of Willowood Imidacloprid Technical in order to avoid formulation hazards and insure a satisfactory finished product.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Willowood Imidacloprid LLC. Any variance from the federally registered labeling for products containing Imidacloprid will have to be supported by data provided by the formulator.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide **Sto**rage: Store in a cool dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile and dispose of as directed for pesticides below. Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling:

Liner: Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling if available or dispose of empty liner in a sanitary landfill or by incineration.

Outer Drum: Refilable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment or a mix tank. Return to point of sale or offer for recycling if available or dispose of in a sanitary landfill, or by incineration. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Willowood Imidacloprid LLC. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD IMIDACLOPRID LLC MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. To the extent consistent with applicable law, no agent of Willowood Imidacloprid LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD

088544-00002.20121120.V3

Willowood Imidacloprid LLC Label Amendment-Add Termiticide

IMIDACLOPRID LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT WILLOWOOD IMIDACLOPRID LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL, SAFETY AND POLLUTION PREVENTION

Willowood Imidacloprid LLC

DEC 1 0 2012

c/o

Cheryl Wagner

Wagner Regulatory Associates, Inc.

P.O. Box 640

Hockessin, DE 19707

Subject:

Amendment to add me-too crops to the label and to replace several individual crops with

their respective crop groups EPA Registration No.: 88544-2

Primary Brand Name: Willowood Imidacloprid Technical

Submission Date: October 12, 2012

Dear Ms. Wagner:

The label referred to above, submitted under FIFRA, as amended, is <u>acceptable</u>. Please submit one final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions, please contact Gene Benbow at (703) 347-0235 or via email at <u>benbow.gene@epa.gov</u>.

Sincerely.

Venus Eagle

Product Manager 01

Insecticide-Rodenticide Branch Registration Division (7505P)

Willowood Imidacloprid Technical For Use in the Manufacture of Insecticides

Active ingredient:	
Imidacloprid 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	97.7%
Other Ingredients:	2.3%
Total:	100.0%

KEEP OUT OF REACH OF CHILDREN WARNING

	First Aid
IF SWALLOWED	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If INHALED	 Move person to fresh air. If person is not breathing, call 911 or an ambulance then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
Note	to Physician: No specific antidote is available. Treat symptomatically.
treatment. EMERGENCY NUME For 24 Hour Medical	iner or label with you when calling a poison control center or doctor, or going for BERS Emergency Assistance (Human or Animal), Call 1-800-222-1222. ency Assistance (Spill, Leak, Fire, or Accident), Call ChemTrec at 1-800-424-9300.

EPA Reg. No. 88544-2		EPA Est. No.
Net Contents:	_Pounds	

Manufactured for: Willowood Imidacloprid LLC 1600 NW Garden Valley Blvd, Suite 120 Roseburg, OR 97471

ACCEPTED

DEC 10 2012

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as ansarded, for the posticide
Registered under
EPA Reg. No. 88544-2

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Warning. May be fatal if swallowed. Harmful if inhaled. Avoid breathing spray mist or vapor. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves made out of any waterproof material. Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharged Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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- 4. Greenhouse Non-food Crop, Residential and Commercial Indoor: Greenhouse Ornamentals, Interior Plantscapes.
- 5. Indoor Non-food Use: Woods, Plastic, and Textiles:

Preservatives for Wood and Wood-based Composite Products: For indoor manufacturing of wood preservatives or preservatives intended for use in wood-based composite products, such as waferboard, fiberboard, particleboard, plywood, and oriented strand board to prevent the attack of insects, including termites.

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agricultural products, and other applications. Use for film and sheeting, extruded profiles, plastisols, molded goods, organosols, fabric coatings, and similar systems requiring termiticidal compounds.

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Handle and open container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile and dispose of as directed for pesticides below. Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away.

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DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD IMIDACLOPRID LLC MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. To the extent consistent with applicable law, no agent of Willowood Imidacloprid LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD IMIDACLOPRID LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT WILLOWOOD IMIDACLOPRID LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.



Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

November 26, 2012

Document Processing Desk (AMEND)
ATTN: Venus Eagle, PM 1
Registration Division (7504P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

Dear Ms. Eagle;

Subject: Willowood Imidacloprid Technical (EPA Registration Number 88544-2)

Amendment to Add Additional Use for Formulation

Wagner Regulatory Associates, Inc., as agent for Willowood Imidacloprid LLC, submits the enclosed application to amend the labeling for the above referenced product. This product is similar to the imidacloprid technical products registered by Albaugh under registration number 42750-104, and UPI under registration number 70506-122.

An additional use has been added to this label: for formulation of end use products for structural pest control and for use on tobacco.

In support of this request, the following documents are attached:

- Letter from Willowood Imidacloprid LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Amendment (8570-1)
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix (8570-35)
- Draft labeling (1 highlighted copy) and CD
- Certification With Respect to Label Integrity
- Copy of the EPA approved labels for EPA Reg. Nos. 42750-104 and 70506-122

If you have any questions about this submission please contact the undersigned at (302) 635-7289 or Cheryl@wagnerreg.com.

Respectfully submitted,

Cheryl Wagner

Agent for Willowood Imidacloprid LLC

Please read instructions on rever-	se before completir - form	n.	Form	n Appro	oved, OMB No. 2	070-006	0. Approval ex	pires 05-31-98
					K ⊿istrati	on	OPP Identifie	er Number
United States					┨	1		
Environmental Protection Age		Agency	X	Amendme	ent			
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	Appli	cation fo	r Pesticide - Se			1		**************************************
Company/Product Number			2. EPA Product	Manag	ger	3. Pr	roposed Class	sification
88544-2			Venus Eagle					
4. Company/Product (Name)			PM#			 X	None	Restricted
Willowood Imidacloprid LLC /			1					,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
Willowood In	nidacloprid Technical							
5. Name and Address of App	licant (Include Zip Cod	le)	6. Expedited Re					
Willowood Imidacloprid LL	c		(b)(l), my product to:	t is sim	nilar or identical	in com	position and	labeling
c/o Wagner Regulatory As			EPA Reg. No. 70	506-1	22			
P.O. Box 640						-411-	41-11	
Hockessin, DE 19707	f this is a new addres:		Product Name: 1	JPI IM	иазсюрна тесп	ınıcaı in	secticide	
LI CHECK	Tims is a new address		ection - II					
Amendment - Explain be	low.	36		ed labe	els in response to			
			Agency let	tter date	ed _		***************************************	
Resubmission in respons								
☐ Notification - Explain bel			Other - Ex	plain be	elow.			
Explanation: Use additional	page(s) if necessary.	(For Section	l and Section II.)					
Amendment to add an addition	nal use to this label: fo	r formulation	n of end use products	s for st	tructural pest co	ontrol ar	nd add use or	ı tobacco.
		Se	ection - III					
1. Material This Product Wil	l Be Packaged In:							
Child-Resistant Packaging	Unit Packaging		Water Soluble Packa	aging	2. Type of C		er	
Yes*	Yes		Yes			Metal		
X No	X No		X No			Plastic		
	If "Yes"	No. per	If "Yes" No	, per		Glass		
* Certification must	Unit Packaging wgt.	container	Package wgt cor	ntainer		Paper		
be submitted						Other (Specify) HDP	E lined bags
3. Location of Net Contents Ir	I nformation	4. Size(s)	Retail Container	1 6	5. Location of L	abel Di	rections	*******
X Labe! Con	tainer	50 gallon, 2	275 gallons		X On Lat	el		
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1. Contact Point (Complete ite	ems directly below for			ontact	fed, if necessar	v. to pro	ocess this app	olication.)
Name	Title				Telephon	e No. (Include Area	
Chery! Wagner			ood Imidacloprid LLC		(302) 635			
I certify that the statements I have	Certifi e made on this form and		nts thereto are true, acc	urate a			Application eived	4 +
I acknowledge that any knowingl both under applicable law.							1.4	
Signature		3. Title					(Stamper	a),
T. Olduranie	Vi	1	Willowood Imidaclop	rid 114				
4. Tuned Name	ware,				<u> </u>			
4. Typed Name		5. Date	-00.0040					
Chery! Wagner		Novembe	r 26, 2012					



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

WASHINGTON	WASHINGTON, D.C. 20460				
Paperwork Reduction Act Notice: The public reponing burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for registration ond special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.					
Certification with Respect to C	itation of Data				
Applicant's/Registrant's Name, Address, and Telephone Number Willowood Imidacloprid LLC, P.O. Box 640, Hockessin, DE 19707		EPA Registration Number/File Symbol 88544-2			
Active Ingredient(s) and/or representative test compoundts) Imidacloprid		Dale November 26, 2012			
General Use Pattem(s) (list-all those claimed for this product using 40 CFR Part 158) Terrestrial Food Crops, Non-Food Crops, Ornamentat) 	Product Name Willowood Imidacloprid Technical			
NOTE: If your product is a 100% repackaging of another purchased EPA-registere submit this form. You must submit the Formulator's Exemption Statement (EPA Form		r all the same uses on your label, you do not need to			
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should			
SECTION I: METHOD OF DATA SUPP	ORT (Check one me	ethod only)			
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	✓ under the	the selective method of support (or cite-all option selective method), and have included with this form a I list of data requirements (the Data Matrix form must be			
SECTION II: GENERAL (OFFER TO PAY				
Required if using the cite-all method or when using the cite-all option under the select	live method to satisf	y one or more data requirements			
I hereby offer and agree to pay compensation, to other persons, with regard to	the approval of this	application, to the extent required by FIFRA.			
SECTION III: CERTI	FICATION				
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a fype of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.					
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study,	or reregistration, the	at I am the original data submitter or that I have obtained			
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (l) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.					
I certify that in all instances where an offer of compensation is required, cop- accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will the evidence to the Agency upon request, trunderstand that the Agency may initiate action FIFRA.	e submitted to the	Agency upon request. Shoute i fail to produce such			
I certify that the statements I have made on this form and all attachm knowingly false or misleading statement may be punishable by fine or impriso					
Signature	Oate	Typed or Printed Name and Title			
Church Wagne	11/26/2012	Cheryl Wanger Agent			

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.



WASHINGTON, D.C. 20460

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DATA MATRIX Date: November 26, 2012 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Page 1 of 8 Product: Willowood Imidacloprid Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1650,	Product identity, composition/Description of	48528401	Willowood Imidacloprid LLC	Own	
830.1670,	materials Used to Produce the			Addition of the state of the st	
	Product/Description of Formulation				
	Process/Discussion of Formation of Impurities				
830.1700	Preliminary Analysis	48715002	Willowood Imidacloprid LLC	Own	
830.1750	Certification of Limits		Willowood Imidacloprid LLC	Own	1
830.1800	Enforcement Analytical Method	48715002	Willowood Imidacloprid LLC	Own	
830.6302	Color	48528402	Willowood Imidacloprid LLC	Own	
830.6303	Physical State	48528402	Willowood Imidacloprid LLC	Own	
830.6304	Odor	48528402	Willowood Imidacloprid LLC	Own	
°30.6313	Stability to Normal & Elevated Temperatures	48528402	Willowood Imidacloprid LLC	Own	
J.6314	Oxidation/Reduction	48528402	Willowood Imidacloprid LLC	Own	
830.6315	Flammability	48528402	Willowood Imidacloprid LLC	Own	
830.6316	Explodability	48528402	Willowood Imidacloprid LLC	Own	
830.6317	Storage Stability	48528402	Willowood Imidacloprid LLC	Own	
830.6319	Miscibility	48528402	Willowood Imidacloprid LLC	Own	
830.6320	Corresion Characteristics	48528402	Willowood Imidacloprid LLC	Own	
830.6321	Dielectric Breakdown Voltage	48528402	Willowood Imidacloprid LLC	Own	
830.7000	pH	48528402	Willowood Imidacloprid LLC	Own	
830.7050	UV/Visible Light Absorption	48528402	Willowood Imidacloprid LLC	Own	
830.7100	Viscosit/	48528402	Willowood Imidacloprid LLC	Own	
830.7200	Melting Point	48528402	Willowood Imidacloprid LLC	Own	

Signature	Name and Title	Date
Quil Dagner	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	November 26, 2012
		. 1/



WASHINGTON, D.C. 20460

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Date: November 26, 2012 EPA Reg No./ File Symbol: 88544-2 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Predient: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7220	Boiling Point	48528402	Willowood Imidacloprid LLC	Own	
830.7300	Relative Density	48528402	Willowood Imidacloprid LLC	Own	
830.7370	Dissocation Constants in Water	48528402	Willowood Imidacloprid LLC	Own	
830.7520	Particle Size, Fiber Length, and Diameter Distribution	48528404	Willowood Imidacloprid, LLC	Own	
830.7550	Octanol/Water Partition Coefficient	48528402	Willowood Imidacloprid LLC	Own	
830.7840	Solubility in Organic Solvents	48528402	Willowood Imidacloprid LLC	Own	
830.7860	Water Solubility	48528402	Willowood Imidacloprid LLC	Own	
830.7950	Vapor Pressure	48528402	Willowood Imidacloprid LLC	Own	
870.1100, 870.1200,	Acute Oral Toxicity, Acute Dermal Toxicity,	Cite All	Syngenta Crop Protection, LLC Greensboro, NC	Pay	
°70.1300, J.2400,	Acute Inhalation Toxicity, Primary Eye Irritation,	- Harris	Nufarm Americas Inc. Morrisville, NC		
870.2500, 870.2600	Primary Dermal Irritation, Skin Sensitization		Bayer CropScience LP Research Triangle Park, NC		
Generic Data 810.3500	Generic Data Premises Treatments		FMC Corp. Agricultural Products Group Philadelphia, PA		
810.3600	Structural Treatments		Chemtura Corporation		
			Middlebury, CT		
			Bayer Environmental Science Research Triangle Park, NC		
			The Scotts Company Marysville, OH		

Signature.	Name and Title	Date
(Line Wa ana	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	November 26, 2012
	Tenery Wagner, Agent for Willowood Hilladelopija DDC	170 1011001,201, 2012



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DATA MATRIX Date: November 26, 2012 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Page 3 of 8 Product: Willowood Imidacloprid Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Cleary Chemicals, LLC		
		ļ	Dayton, NJ	_	
			McLaughlin Gormley King Co.		
**************************************		i	Minneapolis, MN		
			PBI/Gordon Corp.		
			Kansas City, MO	_	
		1	Osmose Inc.		
			Buffalo, NY		
			Bayer Corp.		
			Kansas City, MO		
		-	Helena Chemical Co]	
Andreade			Memphis, TN		
tinativisme.			Gustafson LLC	1	
**			Dallas, TX		
			J.J. Mauget Co.	1	
			Woodbridge, VA		
		İ	The Andersons Lawn Fertilizer Division	1	
			Maumee, OH		
			Chemical Specialties Inc.	1	
		1	Harrisburg, NC		
			Bayer Healthcare LLC	1	
	<u> </u>		Shawnee Mission, KS		

Signature (1)	Name and Title	Date
the el warner	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	November 26, 2012



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Date: November 26, 2012 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Page 4 of 8 Willowood Imidacloprid Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Mitsui Chemicals Inc.		
			Valdosta, GA		
			Loveland Products, Inc.]	
			Greeley, CO		
		44-	Nufarm Limited	1	
			Morrisville, NC		
			Lanxess Corporation	1	
			Pittsburgh, PA		
		ļ	Albaugh Inc.	1	
			Valdosta, GA		
		İ	Aeroxon Inc.	1	
			Fort Lee, NJ		
			Control Solutions, Inc.	1	
		*	Pasadena, TX		İ
		İ	Nufarm Americas, Inc.		
			Morrisville, NC		
			Makhteshim-Agan of North America Inc	1	
**	· · · · · · · · · · · · · · · · · · ·	1	Raleigh, NC		
	Harmonia de la compania del compania del compania de la compania del compania del compania de la compania de la compania del compania d		Spray Drift Task Force	1	
·			Washington, DC		
			Cheminova, Inc.	1	
			Arlington, VA		

Signature ()	Name and Title	Date
hung Wagner	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	November 26, 2012
	 	



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	DATA MATR	X	
Date: November 26, 2012		EPA Reg No./ File Symbol: 88544-2	Page 5 of 8
Applicant's/Registrant's Name and Address:	Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc.	Product:	
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical	
redient: Imidacloprid			

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Mycogen Seeds		
			Indianapolis, IN		
			Arbor Systems, LLC		
		l de la companya de la companya de la companya de la companya de la companya de la companya de la companya de	Greeley, CO		
			Pet Logic LLC		
			Omaha, NE	-	
			Repar Corp.		
			Washington, DC	İ	
			United Phosphorus Inc.		
			King of Prussia, PA	-	
			Sulphur Mills Ltd.		
		1	Clovis, CA		
			Nufarm Inc.	i	
			Morrisville, NC		
			1SK Biosciences Corporation	-	
			Concord, OH		
			Outdoor Residential Exposure Task		
2			Force; Washington, DC		
ì. •			Agricultural Reentry Task Force		
			Washington, DC		
			Bayer Advanced	_	
			Research Triangle Park, NC		

Signature	Name and Title	Date
Church Wagner	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	November 26, 2012



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Date: November 26, 2012 EPA Reg No./ File Symbol: 88544-2 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Product: Willowood Imidacloprid Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agrisel USA, Inc.		
			Brookfield, CT		
			Scimetrics Ltd. Corporation	1	
			Wellington, CO		
		İ	Zelam Ltd.		
	A STATE OF THE STA		Lake Oswego, OR	j	
			Rockwell Laboratories, Ltd.	1	
			North Kansas City, MO		
		ł	Sapstain Industry Group (SIG)		
			Titusville, NJ		
			Univar USA Inc.	1	
		İ	Brookfield, CT		
			Innovative Pest Control Products	Ī	
*			Boca Raton, FL		
			FIFRA Endangered Species Task Force	1	
		and the second s	Washington, DC		
		Ì	Arborjet	1	
<i></i>			Silver Spring, MD		
			Rainbow Treeeare Scientific	1	***************************************
<u> </u>			Advancement; Minnetonka, MN		
			Residential Exposure Joint Venture		
			Washington, DC		

Signature (\)	Name and Title	Date
huel Wagner	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	November 26, 2012



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	DATA MATR	IX	
Date: November 26, 2012		EPA Reg No./ File Symbol: 88544-2	Page 7 of 8
Applicant's/Registrant's Name and Address:	Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc.	Product:	
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Teehnical	

Guideline Study Name	MRID Number	Submitter	Status	Note
		Agricultural Handlers Exposure Task		
		Force; Macon, MO]	
		Arch Treatment Technologies, Inc.		
	1	Atlanta, GA		
		Gro-Pro, LLC		
	1	Gig Harbor, WA		
		Rotam Limited	1	
		Sarasota, FL		
			1	
	**		-	İ
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			-	
** ** * * * * **			1	
			1	
	and a second			
		}	1	
		Hockessin, DE		
	Guideline Study Name	Guideline Study Name MRID Number	Agricultural Handlers Exposure Task Force; Macon, MO Arch Treatment Technologies, Inc. Atlanta, GA Gro-Pro, LLC Gig Harbor, WA Rotam Limited Sarasota, FL Etigra LLC Gig Harbor, WA Sharda Worldwide Exports Pvt. Ltd. Hockessin, DE Ensystex III, Inc. Gig Harbor, WA Rotam Agrochemical Company Limited Sarasota, FL Direct Ag Source, LLC Brookfield, CT CEVA Animal Health LLC Rutherford, NJ Sharda USA LLC	Agricultural Handlers Exposure Task Force; Macon, MO Arch Treatment Technologies, Inc. Atlanta, GA Gro-Pro, LLC Gig Harbor, WA Rotam Limited Sarasota, FL Etigra LLC Gig Harbor, WA Sharda Worldwide Exports Pvt. Ltd. Hockessin, DE Ensystex III, Inc. Gig Harbor, WA Rotam Agrochemical Company Limited Sarasota, FL Direct Ag Source, LLC Brookfield, CT CEVA Animal Health LLC Rutherford, NJ Sharda USA LLC

Signature	Name and Title	Date
huellage	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	November 26, 2012



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Date: November 26, 2012 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Predient: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Celsius Property B.V. Amsterdam (NL)		
			Raleigh, NC		
			Amtide, LLC		
			Irvine, CA		
			Ensystex IV, Inc.		
			Gig Harbor, WA		
			Viance, LLC	1	
			Charlotte, NC		
			Dalian Cliemplty Chemicals Co. Ltd.	1	
			Washington, DC		
			Generic Endangered Species Task Force	1	
			Gig Harbor, WA		
			Arcana, LLC	1	
			Johnstown, CO		
	***************************************		Abamax Chemical LLC		
			Hockessin, DE		
			Willowood, LLC	1	
•		1. Artista	Gig Harbor, WA		
			Willapa-Grays Harbor Oyster Growers		
·			Eltopia, WA		

Footnotes: 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4

Signature (Name and Title	Date
They Wagne	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	November 26, 2012

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL				
EPA Registration #	Date Submitted to EPA	Electronic file name		
88544-2		088544-00002.20121120.V3.pdf 088544-00002.20121120.V3_highlighted.pdf		

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature

November 26, 2012
Date

Cheryl Wagner
Name (typed)

Agent for Willowood Imidacloprid LLC
Title

There is an ELECTRONIC LABEL for this action

You can use Acrobat to compare the e-label to the previous version (and find the changes). You can also use Acrobat to mark-up the e-label with your comments

or

If e-label was submitted via

CD-ROM with paper application

then you will find e-label in

Electronic Label Library

If the e-label is not found in the ELL then it was probably not named correctly and could not be entered into the ELL. However, the file can be retrieved from the CD which is retained by the Front End.

If e-label was submitted via

XML E-Submission (no paper)

then you will find e-label in

Documentum

See overview of processing e-labels on other side of this sheet.

If you have any questions on e-labels, please contact one of your division e-label experts:

AD	Willie Abney	308-1689
	Renae Whitaker	308-7003
	Tracy Lantz	308-6415
BPPD		
RD	Tom Harris	308-9423



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

November 30, 2012

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

WAGNER REGULATORY ASSOCIATES LORI KOHLER WILLOWOOD IMIDACLOPRID, LLC PO Box 640 HOCKESSIN, DE 19707-0640

PRODUCT NAME: WILLOWOOD IMIDACLOPRID TECHNICAL

COMPANY NAME: WILLOWOOD IMIDACLOPRID, LLC

OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 88544-2 EPA RECEIPT DATE: 11/27/12

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

Front End Processing Staff Information Services Branch

Information Technology & Resources Management Division

June 27, 2011

To: Whom it May Concern

Re. Designation of Agent for, Wittowood Imidacloprid, LLC 1600 NW Garden Valley Blvd. Sulte 120 Roseburg, OR 97471

Dear Sir or Madam:

This tetter serves as notification that Willowood Imidacloprid, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to its imidactoprid products that Willowood Imidacloprid, LLC will register with US EPA and the states. Please forward all correspondence for Willowood Imidacloprid, LLC and its products to:

Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feet free to call me at if you have any questions.

Respectfully submitted.

Brian Heinze President/CEO

cc: WRA, the

16tl0 NW Garden Valley Blvd., Suite [20] Ruseburg, Oregon 97471





85442-2 Gene Benbow to: cheryl

12/06/2012 09:11 AM

Hi Cheryl,

I have some comments for this label for you before I can stamp it and kick it out.

Under "Terrestrial Food Crops":

- Please change "Root and Tuber Vegetables Crop Group" to "Root and Tuber Vegetables Crop Group, except Sugar Beet (just for clarity on the crop group name - sugar beets are listed separately, so it's just semantics)
- 2. Please delete "Tropical Fruit Crop Group" and replace with "Tropical Fruits (Acerola, etc.)" so that they are listed individually. You can see the separate tolerances granted for these crops here on the eCFR:

http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=94ad161c7eff390fe5cd1ac599fad926&ty=HTML&h=L&r=SECTION&n=40y25.0.1.1.28.3.19.216

They might be making an actual tropical fruit crop group, but I haven't seen anything for it yet.

Let me know if you have any questions, and once you can email me a clean label I think we can crank this out!

Thanks,

Gene Benbow
Wildlife Biologist
Insecticide-Rodenticide Branch, S-7225
Registration Division (7505P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
(703) 347-0235
http://www.epa.gov/pesticides/

- 40.	on reverse before completion form.			ved ∩MB No. 2 K. ⊌istrat			fier Number
⊕EPA	United States Environmental Protection	n Agency	Х	Amendm	ent		
	Washington, DC 2046	30		Other		ļ	
		for Pesticide - Se					
t. Company/Product N	lumber	2. EPA Product N	lanage	er] 3. F	Proposed Cla	ssification
88544-2		Venus Eagle					
4. Company/Product (PM#				None	Restricted
Willowood Imidacloprie		1					
Willo	wood Imidacloprid Technical				<u> </u>		
Willowood Imidack c/o Wagner Regul P.O. Box 640 Hockessin, DE 19	atory Associates, Inc.	6. Expedited Rev (b)(l), my product to: EPA Reg. No. 838 Product Name: To	is simi 351-5	ilar or identica	ıl in coı		
		Section - II					
Notification - Ex Explanation: Use add Amendment to add the	response to Agency letter dated	Agency lett Me Too" A Other - Exp on I and Section II.) s, Bulb Vegetables, Car	er date pplicati lain be	ion. low. y, Coffee, Glo	be Arti		
	9	Section - III					<u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>
1. Material This Proc	luct Will Be Packaged in:	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				***************************************	
Child-Resistant Packa Yes* No * Certification must be submitted	ging Unit Packaging Yes X No If "Yes" No. per	1	ging per tainer	2. Type of X	Metal Plastic Glass Paper	c	PE lined bags
3. Location of Net Co		s) Retail Container n, 275 gallons	5	Location of X On La	bei	Directions accompanyin	ng product
6. Manner in Which L	X	Lithograph Paper glued Stenciled	-	Otheradh	esive b	acked label_	
	S	Section - IV					
	nplete items directly below for identificati	ion of individual to be co	ntacte				
Name Cheryl Wagner		owood Imidacloprid LLC		Telepho (302) 63	5-7289		
	Certification ents I have made on this form and all attachm knowingly false or misleading statement may w.					te Application sceived Stamp	

2. Signature

4. Typed Name

Cheryl Wagner

3. Title

5. Date

October 12, 2012

Agent for Willowood Imidacloprid LLC



WASHINGTON, D.C. 20460

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Date: October 12, 2012 EPA Reg No./ File Symbol: 88544-2 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Page 1 of 8 Willowood Imidacloprid Technical

gredient: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Subinitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1650,	Product identity, composition/Description of	48528401	Willowood Imidacloprid LLC	Own	
830.1670,	materials Used to Produce the				
	Product/Description of Formulation	,			
	Process/Discussion of Formation of Impurities			·	
830.1700	Preliminary Analysis	48715002	Willowood Imidacloprid LLC	Oivn'	
830.1750	Certification of Limits		Willowood Imidacloprid LLC	Own	Ĭ <u>.</u> I
830.1800	Enforcement Analytical Method	48715002	Willowood Imidacloprid LLC	Own	
830.6302	Color	48528402	Willowood Imidacloprid LLC	Own	
830.6303	Physical State	48528402	Willowood Imidacloprid LLC	Own; "	
830.6304	Odor	48528402	Willowood Imidacloprid LLC	Oivn -	
830.6313	Stability to Normal & Elevated Temperatures	48528402	Willowood Imidacloprid LLC	Own	
0.6314	Oxidation/Reduction	48528402	Willowood Imidacloprid LLC	Own	
830.6315	Flammability	48528402	Willowood Imidacloprid LLC	Oivn	
830.6316	Explodability	48528402	Willowood Imidacloprid LLC	Own	
830.6317	Storage Stability	48528402	Willowood Imidacloprid LLC	Own	
830.6319	Miscibility	48528402	Willowood Imidacloprid LLC	Own	
830.6320	Corrosion Characteristics	48528402	Willowood Imidacloprid LLC	Own	
830.6321	Dielectric Breakdown Voltage	48528402	Willowood Imidacloprid LLC	Own	
830.7000	pН	48528402	Willowood Imidacloprid LLC	Own	
830.7050	UV/Visible Light Absorption	48528402	Willowood Imidacloprid LLC	Oıyn	
830.7100	Viscosity	48528402	Willowood Imidacloprid LLC	Own	
830.7200	Melting Point	48528402	Willowood Imidacloprid LLC	Own	

		P
Signature,	Name and Title	Date
Church Nagan	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	October 12, 2012
· · · · · · · · · · · · · · · · · · ·		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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Date: October 12, 2012 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 BEPA Reg No./ File Symbol: 88544-2 Product: Willowood Imidacloprid Technical

gredient: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7220	Boiling Point	48528402	Willowood Imidacloprid LLC	Own	
830.7300	Relative Density	48528402	Willowood Imidacloprid LLC	Own	
830.7370	Dissocation Constants in Water	48528402	Willowood Imidacloprid LLC	Own	
830.7520	Particle Size, Fiber Length, and Diameter Distribution	48528404	Willowood Imidacloprid, LLC	Own	
830.7550	Octanol/Water Partition Coefficient	48528402	Willowood Imidacloprid LLC	Own	
830.7840	Solubility in Organic Solvents	48528402	Willowood Imidacloprid LLC	Own	
830,7860	Water Solubility	48528402	Willowood Imidacloprid LLC	Own	
830.7950	Vapor Pressure	48528402	Willowood Imidacloprid LLC	Own.	
870.1100,	Acute Oral Toxicity,	Cite All	Syngenta Crop Protection, LLC	Pay :	
870.1200,	Acute Dermal Toxicity,		Greensboro, NC		
870.1300,	Acute Inhalation Toxicity,		Nufarm Americas Inc.	· · · ·	
0.2400,	Primary Eye Irritation,		Morrisville, NC]	
870.2500,	Primary Dermal Irritation,		Bayer CropScience LP		
870.2600	Skin Sensitization		Research Triangle Park, NC		
Generic Data	Generic Data		FMC Corp. Agricultural Products Group]	
810.3500	Premises Treatments		Philadelphia, PA		
810.3600	Structural Treatments		Chemtura Corporation	1	
	CAN adde an interest	All Covered by	Middlebury, CT		
	I day	perent label	Bayer Environmental Science		
	in constituted area		Research Triangle Park, NC		
	in case letter died	83851-5	The Scotts Company		
	14/11/11		Marysville, OH		

-> male from Ust

Signature, 5	Name and Title	Date
here Boars	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	October 12, 2012
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DATA MATRIX Date: October 12, 2012 EPA Reg No./ File Symbol: 88544-2 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 gredient: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Cleary Chemicals, LLC	-	
	·		Dayton, NJ	_	
		-	McLaughlin Gormley King Co.		
			Minneapolis, MN	1	
			PBI/Gordon Corp.		! !
	_		Kansas City, MO		
		-	Osmose Inc.		
			Buffalo, NY	1	
			Bayer Corp.	· .	
			Kansas City, MO		·
		manus de la companya	Helena Chemical Co]	
			Memphis, TN		
			Gustafson LLC	7	
•			Dallas, TX		
			J.J. Mauget Co.	7	
			Woodbridge, VA		
			The Andersons Lawn Fertilizer Division	1	
			Maumee, OH		
		and the state of t	Chemical Specialties Inc.	7	
			Harrisburg, NC		
			Bayer Healthcare LLC	1	
			Shawnee Mission, KS		

Signature o	Name and Title	Date
Church Worken	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	October 12, 2012



WASHINGTON, D.C. 20460

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	DATA MATR	IX	
Date: October 12, 2012		EPA Reg No./ File Symbol: 88544-2	Page 4 of 8
Applicant's/Registrant's Name and Address:	Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc.	Product:	
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical	

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Mitsui Chemicals Inc.		
			Valdosta, GA	_	
		ļ	Loveland Products, Inc.		
			Greeley, CO		
			Nufarm Limited		
			Morrisville, NC		
			Lanxess Corporation	1	
			Pittsburgh, PA		
		¥	Albaugh Inc.	1 .	
			Valdosta, GA		
			Aeroxon Inc.	1	
			Fort Lee, NJ		
			Control Solutions, Inc.	1 .	
		 	Pasadena, TX		
			Nufarm Antericas, Inc.	1	· . Av
			Morrisville, NC		ļ.
			Makhteshim-Agan of North America Inc	1	
			Raleigh, NC		
		rest of the second seco	Spray Drift Task Force	i	
			Washington, DC		
			Cheminova, Inc.	1	
			Arlington, VA		

Signaturer	Name and Title	Date
Our Wagner	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	October 12, 2012



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WASHINGTON, D.C. 20460

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DATA MATRIX Date: October 12, 2012 EPA Reg No./ File Symbol: 88544-2 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 gredient: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Mycogen Seeds		
			Indianapolis, IN		
			Arbor Systems, LLC		, , , , , , , , , , , , , , , , , , , ,
	**************************************		Greeley, CO	and the second s	
			Pet Logic LLC		
			Omaha, NE		Ì
			Repar Corp.		
			Washington, DC		
			United Phosphorus Inc.	-	
			King of Prussia, PA		· ·
			Sulphur Mills Ltd.		
		and the state of t	Clovis, CA		
			Nufarm Inc.		
			Morrisville, NC		
			ISK Biosciences Corporation		
			Concord, OH		
			Outdoor Residential Exposure Task		
			Force; Washington, DC		
			Agricultural Reentry Task Force		
		ļ	Washington, DC		
		***	Bayer Advanced		
			Research Triangle Park, NC		

Signature ()	Name and Title	Date
hut ware	Cheryl Wagner, Agent for Willowood Imidacioprid LLC	October 12, 2012
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WASHINGTON, D.C. 20460

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DATA MATRIX Date: October 12, 2012 EPA Rcg No./ File Symbol: 88544-2 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 gredient: Imidacloprid

Guideline Rescrence Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agrisel USA, Inc.		
			Brookfield, CT	_	
			Scimetries Ltd. Corporation		
			Wellington, CO		
			Zelam Ltd.		
			Lake Oswego, OR		
			Rockwell Laboratories, Ltd.	3	, _
			North Kansas City, MO		
			Sapstain Industry Group (SIG)		
			Titusville, NJ		
		Light-Array	Univar USA Inc.		
			Brookfield, CT		
			Innovative Pest Control Products	1	
			Boca Raton, FL		
			FIFRA Endangered Species Task Force	1	
			Washington, DC		
		and the state of t	Arborjet	7	
			Silver Spring, MD	1	
			Rainbow Treecare Scientific	7	
			Advancement; Minnetonka, MN	E	
			Residential Exposure Joint Venture		
			Washington, DC	***	

Signature	Name and Title	Date	
hund Wagner	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	October 12, 2012	
		30	



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401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX Date: October 12, 2012 EPA Reg No./ File Symbol: 88544-2 Page 7 of 8 Willowood Imidacloprid LLC Applicant's/Registrant's Name and Address: Product: c/o Wagner Regulatory Associates Inc. Willowood Imidacloprid Technical P.O. Box 640 Hockessin, DE 19707 redient: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agricultural Handlers Exposure Task		
			Force; Macon, MO		
			Arch Treatment Technologies, Inc.	***************************************	
		## ##	Atlanta, GA		
			Gro-Pro, LLC		
			Gig Harbor, WA		
			Rotam Limited		
			Sarasota, FL		
			Etigra LLC		
			Gig Harbor, WA		· · · · · · · · · · · · · · · · · · ·
			Sharda Worldwide Exports Pvt. Ltd.		7 117,117,117,117
	The desired states of the stat		Hockessin, DE		
			Ensystex III, Inc.]	
			Gig Harbor, WA		
			Rotam Agrochemical Company Limited		
			Sarasota, FL	j	
			Direct Ag Source, LLC		
			Brookfield, CT	_	
		*	CEVA Animal Health LLC]	
			Rutherford, NJ		
			Sharda USA LLC	****	
			Hockessin, DE	***	

Signature (1)	Name and Title	Date
heuf Wagner	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	October 12, 2012



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WASHINGTON, D.C. 20460

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DATA MATRIX Date: October 12, 2012 Applicant's/Registrant's Name and Address: Willowood Imidacloprid LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Tredient: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Celsius Property B.V. Amsterdam (NL)		
			Raleigh, NC		
			Amtide, LLC		
		at the second se	Irvine, CA	_	
			Ensystex IV, Inc.	1	
		İ	Gig Harbor, WA] ://:	,
			Viance, LLC		,
			Charlotte, NC		
			Dalian Chemphy Cliemicals Co. Ltd.		
		Add de de de de de de de de de de de de d	Washington, DC	<u> </u>	
			Generic Endangered Species Task Force	•	
	MANAGE TO THE STATE OF THE STAT		Gig Harbor, WA		· · · · · · · · · · · · · · · · · · ·
			Arcana, LLC		
			Johnstown, CO		
			Abamax Chemical LLC		
		++++	Hockessin, DE		
			Willowood, LLC		
	and the second s		Gig Harbor, WA		
			Willapa-Grays Harbor Oyster Growers		
			Eltopia, WA		

Footnotes: 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4

Signature N	Name and Title	Date
Church Warner	Cheryl Wagner, Agent for Willowood Imidacloprid LLC	October 12, 2012
		38. –

October 12, 2012

Document Processing Desk (AMEND) ATTN: Venus Eagle, PM 1 Registration Division (7504P) U.S. Environmental Protection Agency Office of Pesticide Programs Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501

Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Dear Ms. Eagle;

Subject: Willowood Imidacloprid Technical (EPA Registration Number 88544-2)

Amendment to Add Additional crops

Wagner Regulatory Associates, Inc., as agent for Willowood Imidacloprid LLC, submits the enclosed application to amend the labeling for the above referenced product. This product is similar to the imidacloprid product 'Technical Imidacloprid' (EPA Registration number 83851-5), registered by AmTide LLC.

The following crops have been added to this label: Bananas and Plantains, Bulb Vegetables Crop Group, Caneberry, Coffee, Globe Artichoke, Herb Crop Group, Peanuts, Pomegranate, Rye, Sorghum, Soybeans, Tobacco, Tree nuts (excluding Almonds), Turnip, Christmas trees, and Poplar/cottonwood Trees.

The following already approved crops are no longer listed individually since they are included in a listed crop group as defined by EPA's Index of Pesticide Use Sites:

- Apple is included in Pome Fruit Crop Group
- Barley, Sorghum, and Wheat are included in Cereal Grain Crop Group
- Tuberous and Corm vegetables is included in Root and Tuber Vegetables Crop Group
- Pecan is included in Tree Nut Crop Group
- Head and Stem Brassica Vegetables is included in Brassica (Cole) Vegetable Crop Group

In addition, the disposal statement has been updated per PR Notice 2007-4.

In support of this request, the following documents are attached:

- Letter from Willowood Imidacloprid LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Amendment (8570~1)
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix (8570-35)
- Draft labeling (1 highlighted copy) and CD
- Certification With Respect to Label Integrity
- Copy of the EPA approved label for EPA Reg. No. 83851-5

If you have any questions about this submission please contact the undersigned at (302) 635-7289 or Cheryl@wagnerreg.com.

Respectfully submitted,

Agent for Willowood Imidacloprid LLC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

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and 0.25 hours per response for reregistration and special review activities, including time for recomments regarding burden estimate or any other aspect of this collection of information, inclu Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avento this address.	ding suggestions for r	educing the burden to: Director, Collection					
Certification with Respect to Citation of Data							
Applicant's/Registrant's Name, Address, and Telephone Number Wittowood Imidacloprid LLC, P.O. Box 640, Hockessin, DE 19707	EPA Registration Number/File Symbol 88544-2						
Active Ingredient(s) and/or reoresentative test compound(s) tmidacloprid	Date Oclober 12, 2012						
General Use Patlern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food Crops, Non-Food Crops, Ornamentat		Product Name Willowood Imidactoprid Technical					
NOTE: If your product is a 100% repackaging of another purchased EPA-registerer submit this form. You must submit the Formulator's Exemption Statement (EPA Form		r all the same uses on your label, you do not need to					
I am responding to a Data-Call-In Notice, and have included with this form a libe used for this purpose).	ist of companies ser	nt offers of compensation (the Data Matrix form should					
SECTION I: METHOD OF DATA SUPP	ORT (Check one me	ethod only)					
! am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Dala Matrix form should be used for this purpose).	under the	the selective method of support (or cite-all option selective method), and have included with this form a I list of data requirements (the Data Matrix form must be					
SECTION II: GENERAL C	OFFER TO PAY						
[Required if using the cite-all method or when using the cite-all option under the select I hereby offer and agree to pay compensation, to other persons, with regard to							
SECTION III: CERTIFICATION							
t certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.							
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	at I am the original data submitter or that I have obtained					
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (f) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.							
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FtFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.							
t certify that the statements I have made on this form and all attachme knowingly fatse or misleading statement may be puntshable by fine or impriso							
Signature	Date	Typed or Printed Name and Title					
Thurk Warner	10/12/2012	Cheryl V/anger Allent					

There is an ELECTRONIC LABEL for this action

You can use Acrobat to compare the e-label to the previous version (and find the changes). You can also use Acrobat to mark-up the e-label with your comments.

If e-label was submitted via

CD-ROM with paper application

then you will find e-label in

Electronic Label Library

If the e-label is not found in the ELL lhen it was probably not named correctly and could not be entered into the ELL. However, the file can be retrieved from the CD which is retained by the Front End.

or

If e-label was submitted via

XML E-Submission (no paper)

then you will find e-label in

Documentum

See overview of processing e-labels on other side of this sheet.

If you have any questions on e-labels, please contact one of your division e-label experts:

AD	Willie Abney	308-1689
	Renae Whitaker	308-7003
	Tracy Lantz	308-6415
BPPD		
RD	Tom Harris	308-9423



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

October 16, 2012

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

WAGNER REGULATORY ASSOCIATES LORI KOHLER WILLOWOOD IMIDACLOPRID, LLC PO Box 640 HOCKESSIN, DE 19707-0640

PRODUCT NAME: WILLOWOOD IMIDACLOPRID TECHNICAL

COMPANY NAME: WILLOWOOD IMIDACLOPRID, LLC

OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 88544-2

EPA RECEIPT DATE: 10/15/12

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

Front End Processing Staff
Information Services Branch

Information Technology & Resources Management Division

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL						
E P A Registration #	Date Submitted to EPA	Electronic file name				
88544-2	October 12, 2012	088544-00002.20121010.V2.pdf 088544-00002.20121010.V2_highlighted.pdf				

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature

October 12, 2012 Date

Cheryl Wagner

Name (typed)

Agent for Willowood Imidacloprid LLC

Title

June 27, 2011

To: Whom it May Concern

Re: Designation of Agent for:
Willowood Imidacloprid, LLC
1600 NW Gardon Valley Blvd.
Suite 120
Roseburg, OR 97471

Dear Sir or Madam:

This letter serves as notification that Willowood Imidaclophid, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to its imidaclophid products that Willowood Imidaclophid, LLC will register with US EPA and the states. Please forward all correspondence for Willowood Imidaclophid, LLC and its products to:

Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feet free to call me at if you have any questions.

Respectfully submitted,

Brian Heinze President/CEO

cc: WRA, tnc.

t600 NW Garden Valley Blvd., Suite 120 | Ruseburg, Oregon 9747 t



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

February 28, 2012

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

OPP Decision Number: D-459686

EPA File Symbol or Registration Number: 88544-E

Product Name: WILLOWOOD IMIDACLOPRID TECHNICAL

EPA Application Receipt Date: 11-Jan-2012 EPA Waiver Request Receipt Date: 11-Jan-2012

EPA Company Number: 88544

Company Name: WILLOWOOD IMIDACLOPRID, LLC

CATHERINE M. BYRD WAGNER REGULATORY ASSOCIATES WILLOWOOD IMIDACLOPRID, LLC PO Box 640 HOCKESSIN, DE 19707-0640

SUBJECT: Approval of 50% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has approved your request for 50% waiver of the pesticide registration fee associated with the action referenced above. The decision review period for this action will begin on the date of this letter.

The Action has been identified as Action Code: R300

NEW PRODUCT; ME-TOO PRODUCT FAST TRACK;

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman, at (703) 308-9362.

Sincerely,

Oscar Morales, Director

Information Technology & Resources Management Division

Office of Pesticide Programs

Miller h

Material Sent for Data Extraction

Reg. #88544-2
Description: New Product Registration
Material(s) Sent to Data Extraction Contractors:
New Stamped Label Dated 4/23/12
☐ Notification Dated
New CSFs Dated
☐ Other:
□ Decision #: <u>459686</u>
Other Action/Comments:
File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.
Reviewer: <u>Julie A. Chao</u>
Phone: 308-8735 Division: RD/IRB
Date: April 23, 2012



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (T505C) 1200 Pennsylvania Avc., N.W. Washington, D.C. 20460 EPA Reg. Number:

Date of Issuance:

88544-2

APR 2 3 2012

NOTICE OF PESTICIDE:

X Registration
Reregistration
(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

Willowood Imidacloprid Technical Insecticide

Name and Address of Registrant (include ZIP Code):

Willowood Imidacloprid, LLC c/o Ms. Catherine M. Byrd Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time susper dor cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by milers.

This product is unconditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

- 1. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.
- 2. The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. A one year study is required to satisfy these data requirements. You have 18 months from the date of registration to provide these data.

Signature of Approving Official:	Date;
Venus Eagle, Product Manager 01	APR 2 3 2012
Insecticide-Rodenticide Branch, Registration Division (7505P)	

- 3. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No 88544-2."
- 4. Per 40 CFR 156.10(6), submit one copy of your final printed labeling before you release the product for shipment. As defined in 40 CFR 152.3, "final printed labeling" means the "label or labeling of the product when distributed or sold." Clearly legible reproductions or photo reductions will be accepted for unusual labels. Note that a clean copy of the master label in most cases does not meet the definition of final printed labeling.

A stamped copy of the label is enclosed for your records. If the conditions above are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. Please also note that the record for this product currently contains the following CSFs:

Basic CSF, dated January 10, 2012

If you have any questions, please contact Julie Chao at 703-308-8735 or chao.julie@epa.gov.

Venus Eagle Product Manager 01 Insecticide-Rodenticide Branch Registration Division (7505P)

Enclosure

Willowood Imidacloprid Technical Insecticide For Use in the Manufacture of Insecticides

Active ingredient:	
Imidacloprid 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	97.7%
Other Ingredients:	2.3%
Total:	100.0%

KEEP OUT OF REACH OF CHILDREN WARNING

First Aid

IF SWALLOWED	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If INHALED	 Move person to fresh air. If person is not breathing, call 911 or an ambulance then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
Note to Phys	ician: No specific antidote is available. Treat symptomatically.
Have a product con	tainer or label with you when calling a poison control center or

doctor, or going for treatment.

EMERGENCY NUMBERS

For 24 Hour Medical Emergency Assistance (Human or Animal), Call 1-800-222-1222. For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call ChemTrec at 1-800-424-9300. FPA Reg. No. 88544-F

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EPA Est. No. 074134-CHN-001

٨	let C	ontents:	Pounds
ľ		CHUCHA.	FUILIUS

Manufactured for: Willowood Imidacloprid LLC 1600 NW Garden Valley Blvd, Suite 120 Roseburg, OR 97471

> ACCEPTED With COMMENTS In EPA Letter Dated: APR 23 2012

Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

22544-2

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Warning. May be fatal if swallowed. Harmful if inhaled. Avoid breathing spray mist or vapor. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves made out of any waterproof material. Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharged Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Willowood Imidacloprid Technical is intended for formulation into end use products for:

Terrestrial Non-food Crop or Residential and Commercial Outdoor: Lawns, turf grasses, ornamentals.

Terrestrial Non-food Crop, Indoor and Outdoor Use: Darkling beetle and Hide beetle control in and around poultry facilities.

Terrestrial Food Crop: Apple, Barley, Bulb Vegetables, Bushberry, Canola, Citrus, Cotton, Cranberry, Cucurbit Vegetables, Grape, Greenhouse Vegetables, Fruiting Vegetables, Head and Stem Brassica Vegetables, Leafy Vegetables, Leafy Petiole Vegetables, Legume Vegetables, Hop, Pecan, Pome Fruit, Potato, Root Vegetables, edible seed crops for Sorghum, Sugarbeets, Strawberry, Stone Fruit, Tropical Fruit, Tuberous and Corn Vegetables, and Wheat.

Greenhouse Non-food Crop or Residential and Commercial Indoor: Ornamentals

Woods, Plastic, and Textiles:

Preservatives for Wood and Wood-based Composite Products: For indoor manufacturing of wood preservatives or preservatives intended for use in wood-based composite products, such as waferboard, fiberboard, particleboard, plywood, and

oriented strand board when it is important to prevent the attack of insects, including termites.

Preservatives for Plastic: For indoor manufacturing of preservatives intended for use in plastics such as PVC, polyurethane, polyethylene, polypropylene, natural synthetic rubber, and other plastics. These plastics are used in the following applications: boat covers, carpet backings, convertible car tops, flooring, hoses, automotive underbody coatings, pond liners, roofing foils, wall coverings, cable sheeting, film and sheet of agricultural products, and other applications. Use for film and sheeting, extruded profiles, plastisols, molded goods, organosols, fabric coatings, and similar systems requiring termiticidal compounds.

Textiles: For use as a termiticides in textiles such as tents and groundsheets, boat and car covers, awnings, tarpaulins, marine upholstery, seals, felts, and other applications. Formulations must be manufactured indoors.

Detailed information on chemical and physical properties and other formulating specifications for Willowood Imidacloprid Technical are available upon request from Willowood Imidacloprid LLC. Obtain and read this information before undertaking the formulation of Willowood Imidacloprid Technical in order to avoid formulation hazards and insure a satisfactory finished product.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Willowood Imidacloprid LLC. Any variance from the federally registered labeling for products containing Imidacloprid will have to be supported by data provided by the formulator.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Store in a cool dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile and dispose of as directed for pesticides below. Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal:

NONREFILLABLE CONTAINER: Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into processing equipment. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling, if available, or dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

REFILLABLE CONTAINER: Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available or reconditioning if appropriate.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully.

However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Willowood Imidacloprid LLC. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD IMIDACLOPRID LLC MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. To the extent consistent with applicable law, no agent of Willowood Imidacloprid LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD IMIDACLOPRID LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT WILLOWOOD IMIDACLOPRID LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.

RE: 88544-E: Label Comments for Willowood Imidacloprid Technical Insecticide Catherine Byrd

to:

Julie Chao

04/20/2012 11:26 AM

Show Details

History: This message has been replied to.

Hi Julie,

Here is the revised label.

Resubmission

Thanks,

5: 915589

Catherine

Catherine M. Byrd Regulatory Associate



Wagner Regulatory Associates, Inc.

Please note that our address and phone numbers have changed.

P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707 P: 302.635.7283 C: 302.766.3414 F: 302.635.7295 www.wagnerreg.com

From: Julie Chao [mailto:Chao.Julie@epamail.epa.gov]

Sent: Friday, April 20, 2012 7:25 AM **To:** catherine@wagnerreg.com

Subject: Fw: 88544-E: Label Comments for Willowood Imidacloprid Technical Insecticide

Hi Catherine.

Just a friendly reminder that I am holding this pending application until I receive a revised label, per the comments below. Please feel free to contact me if you have any questions about the requested changes.

Thanks, Julie

Julie Chao 703.308.8735 (phone) 703.305.6920 (fax) http://www.epa.gov/pesticides

---- Forwarded by Julie Chao/OC/USEPA/US on 04/20/2012 07:23 AM ----

From: Julie Chao/DC/USEPA/US To: <u>catherine@wagnerreg.com</u> Date: 04/03/2012 02:36 PM

Subject: 88544-E: Label Comments for Willowood Imidacloprid Technical Insecticide

Hi Catherine,

Please see the attached comments on the proposed label for your pending application to register Willowood Imidacloprid Technical Insecticide (88544-E). Let me know if you have any questions. Otherwise, a revised label via email will be fine.

Thanks, Julie

Label Comments for 88544-E (sent via email 4/3/12)

- 1. On page 1, please note that the First Aid statements for "If on Skin or Clothing" and "If in Eyes" are not required. Therefore, you have the option to remove them.
- 2. On page 2, please revise the Hazards to Humans and Domestic Animals to read as follows: "Warning. May be fatal if swallowed. Harmful if inhaled. Avoid breathing spray mist or vapor. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves made out of any waterproof material. Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco, or using the toilet. Remove contaminated clothing and was before reuse.
- 3. On page 2, under the "Terrestrial Non-food Crop or Residential and Commercial Outdoor" section, revise the phrase "...from insecticidal infestation..." to read, "...from insect infestation..."
- 4. On page 2, please move "Above and below ground protection of wood.....from insect infestation" to a new section, headed "Woods, Plastic, and Textiles." Inclusion of these uses requires the following additional language (see 70506-122 or 39967-17 as an additional example):

Preservatives for Wood and Wood-based Composite Products: For indoor manufacturing of wood preservatives or preservatives intended for use in wood-based composite products, such as waferboard, fiberboard, particleboard, plywood, and oriented strand board when it is important to prevent the attack of insects, including termites.

Preservatives for Plastic: For indoor manufacturing of preservatives intended for use in plastics such as PVC, polyurethane, polyethylene, polypropylene, natural synthetic rubber, and other plastics. These plastics are used in the following applications: boat covers, carpet backings, convertible car tops, flooring, hoses, automotive underbody coatings, pond liners, roofing foils, wall coverings, cable sheeting, film and sheet of agricultural products, and other applications. Use for film and sheeting, extruded profiles, plastisols, molded goods, organosols, fabric coatings, and similar systems requiring termiticidal compounds.

Textiles: For use as a termiticides in textiles such as tents and groundsheets, boat and car covers, awnings, tarpaulins, marine upholstery, seals, felts, and other applications. Formulations must be manufactured indoors.

5. On page 2, please move "Darkling beetle and Hide beetle control in and around poultry facilities" to a new section, headed "Terrestrial Non-food Crop, Indoor and Outdoor Use."

The use in poultry houses is an indoor use, and not appropriate for inclusion under a heading specifically for outdoor uses.

- 6. On page 2, in the sentence "Detailed information....are available upon request," revise the word "recommendations" to read "specifications."
- 7. Under the Storage and Disposal section, please provide disposal instructions for non-refillable containers, if recycling is not available. Please also add final disposal instructions for refillable containers.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MEMORANDUM:

Subject:

EPA Reg. No.: 88544-E/Willowood Imidacloprid Technical

DP Barcode: 399511 PC Code: 129099

From:

Marianne Lewis, Biologist

Insecticides/Rodenticides Branch Registration Division (7505P)

To:

Julie Chao, Team Reviewer

Insecticides/Rodenticides Branch Registration Division (7505P)

Applicant:

Willowood Imidacloprid, LLC

P.O. Box 640

Hockessin, DE 19707-0640

FORMULATION FROM EPA Reg. No. 88544-E LABEL:

	% by wt.
Active Ingredient(s):	
Imidacloprid	97.7%
Inert Ingredient(s):	2.3%
Total	100.0%

BACKGROUND: In support of the registration of EPA Reg. No. 88544-E, the registrant is requesting to cite the acute toxicity studies conducted on EPA Reg. No. 70506-122. The cited MRID's are as follows: 468335-03 (81-1), 468335-04 (81-2), 468335-05 (81-3), 468335-06 (81-4), 468335-07(81-5), 468335-08 (81-6). The studies were conducted by Jai Research Foundation. The test material used in each of the studies was EPA Reg. No. 70506-122, 98% imidacloprid. These studies were reviewed and found to be acceptable by TRB/RD on 6/28/06.

After reviewing the studies and the CSF's for the subject product and the cited product, the Agency will allow the registrant to cite the studies listed above to support the registration of the subject product.

RECOMMENDATIONS:

 The acute toxicity studies cited are acceptable to support the registration of EPA Reg. No. 88544-E.

The acute toxicity profile for EPA Reg. No. 88544-E is currently:

Acute Oral	11	Cited (LD ₅₀ = 260 mg/kg)
Acute Dermal	IV	Cited (LD ₅₀ > 5000 mg/kg)
Acute Inhalation	III	Cited (LC ₅₀ $> 0.589 \text{ mg/L}$)
Primary Eye	1V	Cited
Primary Dermal	IV	Cited
Skin sensitization	non sensitizer	Cited

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 088544-E

WILLOWOOD IMIDACLOPRID TECHNICAL

SIGNAL WORD:

WARNING

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

May be fatal if swallowed. Harmful if inhaled. Avoid breathing spray mist or vapor. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Note to CRM/PM/Registrant:

The proposed label should contain a Note to Physician which addresses the acute oral Toxicity Category II. The following statements are some suggested types of information that could be included, if applicable, in the Note to Physicians:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;

- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

DATA PACKAGE BEAN SHEET

Page 1 of t

* * * Registration Information * * *

Date: 06-Mar-2012

Decision #: 459686

DP #: (399511)

PRIA

Parent DP #:

Submission #: 909801

E-Sub #:

	•			
Registration:	88544-E - WILLOWOO	D IMIDACLOPRII	DITECHNICAL	
Company:	88544 - WILLOWOOD IMIDA	ACLOPRID, LLC		
Risk Manager:	RM 01 - Venus Eagle - (703)	308-8045 Room# PY1	S-7913	Photosius
Risk Manager Reviewer:	Julie Chao JCHAO			
Sent Date:		Calculated Due Da	ite: 28-May-2012	Edited Due Date:
Type of Registration:	Product Registration - Section	n 3		
Action Desc:	(R300) NEW PRODUCT;ME	-TOO PRODUCT FAS	T TRACK;	
Ingredients;	129099, Imidacloprid(97.7%)			
	* * * D	ata Package Ir	nformation * *	*
Expedite:	○ Yes ● No	Date Se	ent: 06-Mar-2012	Due Back;
DP Ingredient:	129099, Imidacloprid			
DP Title:	Acute Toxicity Bridging for C	ite All Option		
CSF included:	Yes No Lab	el Included: Yes	No Parent I	DP #:
Assigned To	<u>o</u>	Date In	Date Out	
Organization: RD / II	RB		L:	ast Possible Science Due Date: 13-Apr-2012
Team Name:				Science Due Date:
Reviewer Name: Lewis,	Marianne //	3/6/12	3/29/12	Sub Data Package Due Date:
Comractor Name:				

* * * Studies Sent for Review * * *

No Studies

* * * Additional Data Package for this Decision * * *

Can be printed on its own page

* * * Data Package Instructions * * *

Wagner Regulatory Associates has chosen the "cite-all" option for fulfilling the acute toxicity data requirements for 88544-E, a proposed imidacioprid technical product. Please determine whether the acute toxicity studies submitted in support of 83851-5 and/or 70506-122 can be bridged to support 88544-E, and generate an acute toxicity profile for the product. Please let me know if you need any additional information. Thanks.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

TECHNICAL REVIEW BRANCH SIMILARITY DETERMINATION

23/FEB/2012

MEMORANDUM

Subject:

Name of Pesticide Product:

Willowood Imidacloprid Technical

E.M. Clardin Mbashir Team Leady / Tox

EPA Reg. No. /File Symbol: 88544-E

DP Barcode:

D398503 459686

Decision No:

R300

Action Code: PC Code:

129099 (imidacloprid)

From:

Eugenia McAndrew, Biologist

Technical Review Branch

Registration Division (7505P)

To:

Julie Chao, RM Team 01

Insecticide-Rodenticide Branch Registration Division (7505P)

Applicant:

Willowood Imidacloprid, LLC

c/o Wagner Regulatory Associates

P.O. Box 640

Hockessin, DE 19707

FORMULATION FROM LABEL:

Active Ingredient(s):

% by wt.

Imidacloprid

97.7

Other Ingredient(s):

2.3

Total:

100.0%

ACTION REQUESTED: The Risk Manager requests: "Wagner Regulatory Associates has submitted, on behalf of Willowood Imidacloprid, LLC, an application to register a new imidacloprid technical product. Please determine whether or not the proposed product, EPA File Symbol 88544-E, is substantially similar to EPA Reg. No. 264-755."

BACKGROUND: Willowood Imidacloprid, LLC has applied for registration of Willowood Imidacloprid Technical, EPA File Symbol 88544-E, claiming similarity to Imidacloprid Technical Insecticide, EPA Reg. No. 264-755. Both products are technical grade for manufacturing use only. The submission includes a basic CSF dated January 10, 2012, a label, data matrix and company letter. The registrant is using the cite-all method of data support to satisfy the acute toxicity data requirements.

RECOMMENDATIONS:

- 1. TRB compared the basic CSFs of the proposed product, 88544-E, and the cited product, 264-755, and determined that the two products are substantially similar.
- 2. After search the OPP electronic databases, TRB was unable to locate any acute toxicity memos pertaining to the cited product, 264-755. Therefore, an acute toxicity profile cannot be generated for the proposed product.
- 3. Based on the label for 264-755, the signal word for 88544-E is "WARNING." TRB recommends that the proposed product use the same precautionary labeling as the cited product.
- 4. This memorandum pertains only to the decision concerning whether the subject product is similar to the cited product from an acute toxicological view point. For the purposes of this action, TRB has made no further determination of the adequacy of the toxicological data base or the precautionary label of the cited product.
- 5. The proposed basic CSF submitted for 88544-E must be accepted by the TRB Product Chemistry Team.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

TECHNICAL REVIEW BRANCH SIMILARITY CLINIC DETERMINATION

01/FEB/2006

MEMORANDUM

Subject: Name of Pesticide Product: ENS-010

EPA Reg. No. /File Symbol: 82957-R

DP Barcode:

D325467

Decision No:

363042

PC Code:

129099

From: Eugenia McAndrew, Biologist

Technical Review Branch

Registration Division (7505C)

To: Dani Daniel, RM Team 01

Insecticide-Rodenticide Branch

Registration Division (7505C)

Applicant: Ensystex III, Inc.

2709 Breezewood Ave.

Fayetteville, NC 28303

FORMULATION FROM LABEL:

Active Ingredient(s):

% by wt.

129099 Imidacloprid

99.0

Inert Ingredient(s):

1.0

Total:

100.0%

ACTION REQUESTED/BACKGROUND: Ensystex III, Inc. has applied for registration of ENS-010, EPA File Symbol 82957-R, claiming similarity to Imidacloprid Technical Insecticide, EPA Reg. No. 264-755. Both products are for manufacturing use.

The acute toxicity studies submitted to support registration of the cited product were reviewed and classified as acceptable in a two prior Health Effects Division memos (Ottley; EPA Reg. No. 3125-EUP: NTN 33893 (a.i.); Submission Nos. S406055 and S406872; 24/MAR/1992 and Ottley; D179339; Submission No. S429490; 11/JAN/1993).

RECOMMENDATIONS: We have evaluated the formulations of the proposed product, 82957-R, and the cited product, 264-755, and have determined that they are substantially similar. The acute toxicity data referenced above may be used to support the proposed product.

The acute toxicity profile for ENS-010, EPA File Symbol 82957-R, is as follows:

acute oral toxicity	II	Cited	MRID 42055331
acute dermal toxicity	IV	Cited	MRID 42055332
acute inhalation toxicity	IV	Cited	MRID 42055333
primary eye irritation	IV	Cited	MRID 42055334
primary skin irritation	IV	Cited	MRID 42055335
dermal sensitization	Negative	Cited	MRID 42055336

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #:

082957-00001

PRODUCT NAME:

ENS-010

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals:

SIGNAL WORD:

WARNING

May be fatal if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

First Aid:

If swallowed:

- -Call a poison control center or doctor immediately for treatment advice.
- -Have person sip a glass of water if able to swallow.
- -Do not induce vomiting unless told to by a poison control center or doctor.
- -Do not give anything to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

DATA PACKAGE BEAN SHEET

Date: 07-Feb-2012 Page t of t

Decision #: 459686

DP #: (398503)

PRIA

Parent DP #:

Submission #: 909801

E-Sub #:

	* * * Registration Information * * *						E-Sub#:		
Registration:	88544-E - WILL	OWOOD IMIDAC	LOPRID T	ECHNICAL		_	1300		
							12007		
		e - (703) 308-80 45 Ro				ŕ			
Risk Manager Reviewer:	Julie Chao JCHAO						•		
Sent Date:		Calculate	d Due Date:	01-May-2012	Edite	d Due Date:			
Type of Registration:	Product Registration	- Section 3							
Action Desc:	(R300) NEW PROD	JCT;ME-TOO PRODU	JCT FAST T	RACK;	A A-A A				
Ingredients:	t29099, Imidacloprio	(97.7%)							
	emmere emergen er e e e energemen er en en en en en en en en en en en en en	* * Data Pack			**				
Expedite:	◯ Yes ● No		Date Sent:	07-Feb-2012	. 	Due Back:			
DP Ingredient:	129099, Imidaclopric		***************************************		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
DP Title:	Substantial Similarity	Determination							
CSF Included:	● Yes ○ No	Label Included: (Yes 🔾	No Pare	ent DP #:				
Assigned To	0	Date to	п	Date Out					
Organization: RD / T	'RB				Last Possible Science	e Due Date:	17-Mar-2012		
Team Name: TOX					Scienc	e Due Date:	A		
Reviewer Name:			,,		Sub Data Packag	e Due Date:			
Contractor Name:					_				

* * * Studies Sent for Review * * *

No Studies

* * * Additional Data Package for this Decision * * *

Can be printed on its own page

* * * Data Package Instructions * * *

Wagner Regulatory Associates has submitted, on behalf of Willowood Imidacloprid, LLC, an application to register a new imidacloprid technical product. Please determine whether or not the proposed product, EPA File Symbol 88544-E, is substantially similar to EPA Reg. No. 264-755. Copies of the submission cover letter, labels, CSFs, and data matrix are enclosed. Please let me know if you need anything else. Thanks.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

Rom 2/22/12

BARCODE:398496; Reg. /FILE No.:88544-E PRODUCT: Imidacloprid Technical R300

DATE:

February 21, 2012

SUBJECT:

Product Chemistry Review of ImidaclopridTechnical

Insecticide

FROM:

Akiva Abramovitch, Ph.D.

Technical Review Branch / RD (7505P)

THROUGH:

Shyam B. Mathur, Ph.D.

Product Chemistry Team Leader

Technical Review Branch/RD (7505P)

TO:

Julie Chao / Venus Eagle, PM 1

Insecticide/Rodenticide Branch/ RD (7505C)

COMPANY: WILLOWOOD

PCC: 129099

Decision No. 459686

USE: Food Use Insecticide

MRID 485284-01 and 02 and 487150-01 and 02

INTRODUCTION:

Willowood submitted Group A and B data including a five batch analysis and a CSF dated January 10, 2012 to support a manufacturing site for Imidadoprid in Jiangsu, China.

The registrant claims that the product is substantially similar to the product EPA Reg. No. 264-755. The product label claims 97.70% Imidacloprid Technical

TRB has been requested to complete a product chemistry review of the data including the 5 batch analysis and the CSF dated 1/10/12

Manufacturing process information may be entitled to confidential treatment

BARCODE:398496; Reg. /FILE No.:88544-E PRODUCT: Imidacloprid Technical R300

GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product identity and composition	485284-01	А	The NC of the AI (97.7%) is supported by the 5-batch analysis and and agrees with the label claim. impurities (≥ 0.1%) are listed on the CSF.
830,1600	Description of materials used to produce the product	485284-01	А	The identity of the starting materials and the process used to produce the 97.7% Technical imidacloprid been provided by the registrant.
830.1620	Description of production process	485284-01	A	A single chemical reaction is involved in the synthesis of the Al.
830.1670	Discussion of formation of impurities	485284-01	А	The registrant has provided the complete mechanisms of formation and identification of all the impurities listed on the CSF at levels ≥0.1%.
830.1700	Preliminary analysis	485284-01	А	Five representative batches were analyzed for percent AI and the impurities.
830.1750	Certified limits	485284-01	A	
830.1800	Enforcement analytical method	485284-01	A	The methods submitted for preliminary analysis are suitable for enforcement purposes. The methods are adequate and are supported by acceptable method validation data.

830 Series Subgroup B (Physical-Chemical Properties)

GLN	Requirement	MRID	Status	Result or Deficiency [Test substance; method]
830.6302	Color	485284-02	Α	Beige
830.6303	Physical state	485284-02	Α	Very fine powder
830.6304	Odor	485284-02	Α	Slight odor
830.6313	Stability to normal and elevated temperatures.	485284-02	Α	Stable
830.6314	Oxidation/reduction: chemical incompatibility	485284-02	Α	Reacted with 5% Permanganate to form a light brown sludge. No change with Iron powder
830.6315	Flammability	485284-02	Α	Nonflammable
830.6316	Explodability		NA	In progress
830.6317	Storage stability	485284-02	G	
830.6319	Miscibility		N/A	The TGAI/MUP is a solid at room temperature
830.6320	Corrosion characteristics	485284-02	G	in progress
830.7000	рH	485284-02	Α	5.24 in 1% aqueous dispersion
830.7050	UV/Visible absorption	485284-02	Α	269-270nm at various pH
830,7100	Viscosity		N/A	The TGAI/MUP is a solid at room temperature
830.7200	Melting point	485284-02	Α	144.4 °C; melting range = 134-136 °C for the technical
830.7220	Boiling point		N/A	The TGAI/MUP is a solid at room temperature
830.7300	Density	485284-02	А	Relative density d ²⁰ ₄ = 1.62 at 20 °C (picnometer)

U = Up-grade (additional information required)

BARCODE:398496; Reg. /FILE No.:88544-E PRODUCT: Imidacloprid Technical R300

GLN	Requirement	MRID	Status	Result or Deficiency [Tes	st substance; method]
830.7370	Dissociation constants in water (DC)		А	No dissociation observed	d in aqueous media
830.7550	Octanol/water partition coefficient	485284-02	Α	Pow = 3.9 ± 0.2; log Pow	= 0.57 at 20 °C (literature)
830.7840	Water solubility	485284-02	Α	610 mg/L at pH 7	
830.xxxx	Solvent solubility	485284-02	A	Solubility at 25 °C n-Heptane Acetone 1,2-Dichloroethane Ethyl acetate Methanol n-Octanol Xylene [97.6% TGAI/MUP; EEC	0.29 mg/L 47 g/L 32 g/L 8.0 g/L 10 g/L 0.93 g/L 0.38 g/L Method A6]
830.7950	7950 Vapor pressure 485284-02 A <4 x 10 ⁻⁷ Pa at 20 ℃ [Liter		erature)		

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Upgrade [additional information required); W = waivers

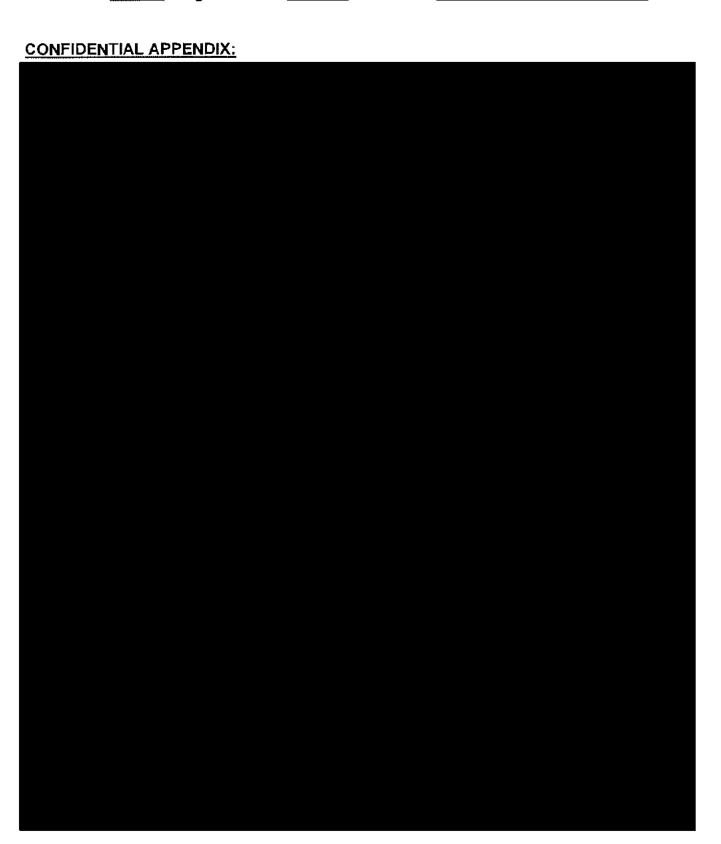
Description of Analytical Methods:

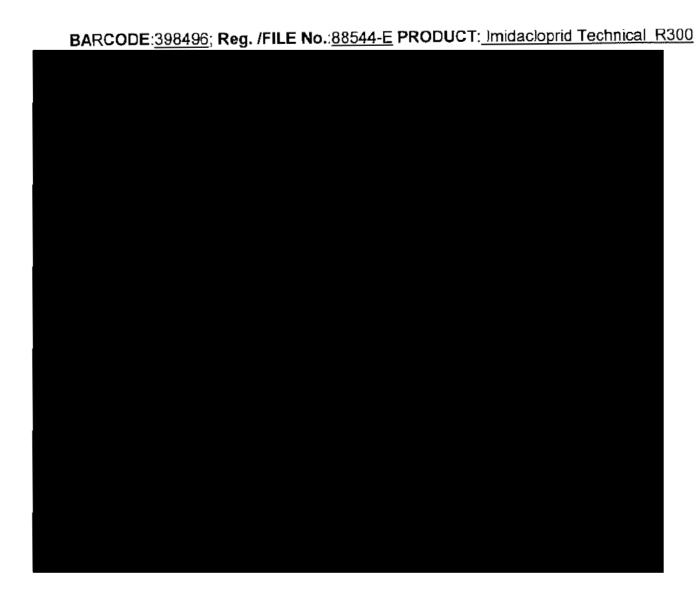
Imidocloprid samples were analysed by High Performance Liquid Chromotography with ultra-violet detection (HPLC - UV) for the content of the active ingredient. The identity of the active ingredient was established by Fourier Transform Infra-red (FTIR) and Liquid Chromatography Mass Spectrometry (LCMS). The water content was determined by Korl Fischer titration (SOP 02-041). Quantitation of impurities was done by HPLC - UV and Liquid Chromatography with Mass Spectrometric detection was used to identify the significant impurities.

Conclusions:

- 1) The 5 batch analysis for the manufacturing site in Germany ranged from 97.7 to 97.9% for an average of 97.7%. All the identified impurities were listed on the CSF were also listed on the basic CSF of the cited product and were all within the certified limits. The registrant stated that the impurities of toxicological significance were analyzed for but were not detected in the product (see Confidential Appendix).
- 2) This product is substantially similar to the cited product EPA Reg. No. 264-755 having identical impurities within the upper certified limits. The active ingredient is at 97.7% and 98% for the cited product.
- 3) The registrant satisfied the data requirements for the manufacturing site on the basic CSF dated January 10, 2012 with the exception of storage stability and corrosion data.

BARCODE: 398496; Reg. /FILE No.: 88544-E PRODUCT: Imidacloprid Technical R300





Kroa

DATA PACKAGE BEAN SHEET

Date: 07-Feb-201
Page t of 2

* * * Registration Information * * *

Date: 07-Feb-2012

Decision #: 459686 DP #: (398496)

PRIA

Parent DP #:

Submission #: 909801

E-Sub #:

Registration:	88544-E - WILLO	WOOD IMIDACLOPRID	TECHNICAL	
Company:	88544 - WILLOWOO	D IMIDACLOPRID, LLC		(\frac{1}{1}\gamma_0^2)
Risk Manager:	RM 01 - Venus Eagle	- (703) 308-8045 Room# PY1 \$	§-7913	
Risk Manager Reviewer:	Julie Chao JCHAO			/
Sent Date:		Calculated Due Date	: 0t-May-2012	Edited Due Date:
Type of Registration:	Product Registration	Section 3		
Action Desc:	(R300) NEW PRODU	CT;ME-TOO PRODUCT FAST	TRACK;	**************************************
Ingredients:	t29099, Imidacloprid	97.7%)		
	***************************************	* * Data Package Inf		**
Expedite:	O Yes O No	Date Sent	: 07-Feb-2012	Due Back:
DP Ingredient;	129099, Imidacloprid			
DP Title:	Product Chemistry	~ ~		
CSF Included:	Yes 🔾 No	Label Included: • Yes) No Parei	nt DP #:
Assigned To	0	Date In	Date Out	34
Organization: RD / T	RB			Last Possible Science Oue Date: 14 Mar-2012
Team Name: CHEM		***************************************		Science Due Date:
Reviewer Name:		P*		
Contractor Name:				

* * Studies Sent for Review * * *

Printed on Page 2

* * * Additional Data Package for this Decision * * *

Can be printed on its own page

* * * Data Package Instructions * * *

Please review the enclosed preliminary analysis data, submitted by Wagner Regulatory Associates on behalf of Willowood Imidacloprid, LLC. These data are intended to support the registration of a new imidacloprid technical product.

Please ALSO review ADDITIONAL PRODUCT CHEMISTRY DATA which were submitted previously to support this formulation, and which are available in PRISM/Documentum under MRIDs 48528401 and 48528402.

Copies of the submission cover letter, proposed label, CSF, and data matrix are also included. Note that Willowood has selected the cite-all option for acute toxicity, although they claim substantial similarity to EPA Reg. No. 264-755 (copy of label enclosed). Please let me know if you need any additional information. Thanks.

Page 2 * * * Studies Sent for Review * * * Decision#: (459686) DP#: (398496) MRJD MRID Status Guideline 86-5 Status Citation Reference Wagner Regulatory Associates, Inc. (2011) 830.1550/Product Identity and Pass (03-Aug-2011) 48528401 Imidacloprid Technical: Product Identity and composition Composition, Description of Materials Used to Produce the Product, Description of Production Process, Description of Formulation Process, and Discussion of Formation of Impurities. Unpublished study prepared by Willowood Imidacloprid, LLC. 69 Wagner Regulatory Associates, Inc. (2011) 830.1600/Description of Pass (03-Aug-2011) 48528401 Imidacloprid Technical: Product Identity and materials used to produce the Composition, Description of Materials Used to product Produce the Product, Description of Production Process, Description of Formulation Process, and Discussion of Formation of Impurities. Unpublished study prepared by Willowood Imidacloprid, LLC. 69 830, t620/Description of Pass (03-Aug-2011) Wagner Regulatory Associates, Inc. (2011) 48528401 Imidacloprid Technical: Product Identity and production process Composition, Description of Materials Used to Produce the Product, Description of Production Process, Description of Formulation Process, and Discussion of Formation of Impurities. Unpublished study prepared by Willowood Imidacloprid, LLC, 69 830,1650/Description of Pass (03-Aug-2011) Wagner Regulatory Associates, Inc. (2011) 48528401 Imidacloprid Technical: Product Identity and formulation process Composition, Description of Materials Used to Produce the Product, Description of Production Process, Description of Formulation Process, and Discussion of Formation of Impurities. Unpublished study prepared by Willowood Imidacloprid, LLC. 69 830.1670/Discussion of Pass (03-Aug-2011) Wagner Regulatory Associates, Inc. (2011) 48528401 Imidacloprid Technical: Product Identity and formation of impurities Composition, Description of Materials Used to Produce the Product, Description of Production Process, Description of Formulation Process, and Discussion of Formation of Impurities. Unpublished study prepared by Willowood Imidacloprid, LLC. 69 Pass (03-Aug-2011) Miller, R. (2011) Willowood Imidacloprid 830.6302/Color 48528402 Technical: Product Chemistry Series B: Product Properties: Color, Physical State, Odor, Stability to Normal and Elevated Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor Pressure. Project Number: ARC/EX/954/013/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 48 p. Miller, R. (2011) Willowood Imidacloprid 830.6303/Physical state Pass (03-Aug-2011) 48528402 Technical: Product Chemistry Series B: Product Properties: Color, Physical State. Odor, Stability to Normal and Elevated

Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants

(n-Octanol/Water), Water Solubility, and Vapor

ARC/EX/954/013/P/1. Unpublished study prepared by Analytical & Regulatory

in Water, Partition Coefficient

Pressure, Project Number:

Chemistry, Inc. 48 p.

	Page 2	f -	
DP#: (398496)	* * * Studies Sent for Review *	* *	Decision#: (459686)
MRID MRID Status	Citation Reference	Guideline	86-5 Status
48528402	Miller, R. (2011) Willowood Imidacloprid	830.6304/Odor	Pass (03-Aug-2011)
	Technical: Product Chemistry Series B:		, ,
	Product Properties: Color, Physical State,		
	Odor, Stability to Normal and Elevated Temperatures, Oxidation/Reduction: Chemical		
	Incompatibility, pH, UV/Visible Absorption,		
	Melting Point/Melting Range, Density/Relative		
	Density/Bulk Density, Dissociation Constants		
	in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor		
	Pressure. Project Number:		
	ARC/EX/954/0 t3/P/t. Unpublished study		
	prepared by Analytical & Regulatory		
	Chemistry, Inc. 48 p.	500 00 (D) 1 W	David (00 Avid 0044)
48528402	Miller, R. (2011) Willowood Imidacloprid Technical: Product Chemistry Series B:	830.6313/Stability to normal and elevated temperatures,	Pass (03-Aug-2011)
	Product Properties: Color, Physical State,	metals, and metal ions	
	Odor, Stability to Normal and Elevated	1110101	
	Temperatures, Oxidation/Reduction: Chemical		
	Incompatibility, pH, UV/Visible Absorption,		
	Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants		
	in Water, Partition Coefficient		
	(n-Octanol/Water), Water Solubility, and Vapor		
•	Pressure. Project Number:		
	ARC/EX/954/013/P/1. Unpublished study		
	prepared by Analytical & Regulatory Chemistry, Inc. 48 p.		
48528402	Miller, R. (2011) Willowood Imidacloprid	830.6314/Oxidizing or	Pass (03-Aug-20 t1)
4000000	Technical: Product Chemistry Series B:	reducing action	
	Product Properties: Color, Physical State,		
	Odor, Stability to Normal and Elevated		
	Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption,		
	Melting Point/Melting Range, Density/Relative		
	Density/Bulk Density, Dissociation Constants		
	in Water, Partition Coefficient		
	(n-Octanol/Water), Water Solubility, and Vapor Pressure. Project Number:		
	ARC/EX/954/013/P/1. Unpublished study		
	prepared by Analytical & Regulatory		
	Chemistry, Inc. 48 p.		
48528402	Miller, R. (2011) Willowood Imidacloprid	830.7000/pH	Pass (03-Aug-2011)
	Technical: Product Chemistry Series B: Product Properties: Color, Physical State,		
	Odor, Stability to Normal and Elevated		
	Temperatures, Oxidation/Reduction: Chemical		
	Incompatibility, pH, UV/Visible Absorption,		
	Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants		
	in Water, Partition Coefficient		
	(n-Octanol/Water), Water Solubility, and Vapor		
	Pressure. Project Number:		
	ARC/EX/954/013/P/1. Unpublished study		
	prepared by Analytical & Regulatory Chemistry, Inc. 48 p.		
48528402	Miller, R. (201 t) Willowood Imidacloprid	830.7050/UV/Visible	Pass (03-Aug-2011)
75025762	Technical: Product Chemistry Series B:	absorption	, ,
	Product Properties: Color, Physical State,		
	Odor, Stability to Normal and Elevated		
	Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption,		
	Melting Point/Melting Range, Density/Relative		
	Density/Bulk Density, Dissociation Constants		
	in Water, Partition Coefficient		
	(n-Octanol/Water), Water Solubility, and Vapor Pressure. Project Number:		
	ARC/EX/954/013/P/1. Unpublished study		
	prepared by Analytical & Regulatory		
	Chemistry, Inc. 48 p.		

Page 2

DP#: (398496) * * * Studies Sent for Review * * * Decision#: (459686) 86-5 Status MRID Status Guideline MRID Citation Reference 830.7200/Melting point/melting Pass (03-Aug-2011) 48528402 Miller, R. (2011) Willowood Imidacloprid Technical: Product Chemistry Series B: range Product Properties: Color, Physical State, Odor, Stability to Normal and Elevated Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor Pressure. Project Number: ARC/EX/954/013/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 48 p. Pass (03-Aug-2011) Miller, R. (2011) Willowood Imidacloprid 830.7300/Density/relative 48528402 Technical: Product Chemistry Series B: density Product Properties: Color, Physical State, Odor, Stability to Normal and Elevated Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor Pressure. Project Number: ARC/EX/954/013/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 48 p. Miller, R. (2011) Willowood Imidacloprid 830.7370/Dissociation Pass (03-Aug-2011) 48528402 Technical: Product Chemistry Series B: constants in water Product Properties: Color, Physical State, Odor, Stability to Normal and Elevated Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor Pressure, Project Number: ARC/EX/954/013/P/t. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 48 p. 830.7550/Partition coefficient Pass (03-Aug-2011) Miller, R. (2011) Willowood Imidacloprid 48528402 Technical: Product Chemistry Series B: (n-octanol/water), shake flask Product Properties: Color, Physical State, method Odor, Stability to Normal and Elevated Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor Pressure. Project Number: ARC/EX/954/013/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 48 p. 830.7560/Partition coefficient Pass (03-Aug-20 t1) Miller, R. (2011) Willowood Imidacloprid 48528402 Technical: Product Chemistry Series B: (n-octanol/water), generator Product Properties: Color, Physical State, column method Odor, Stability to Normal and Elevated Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor Pressure, Project Number: ARC/EX/954/013/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 48 p.

Page 2

DP#: (398496)

*** Studies Sent for Review * * *

DP#. (390490)	Studies Sent for Review	[[N	Decision#: (459686)
MRID MRID Status	Citation Reference	Guideline	86-5 Status
48528402	Miller, R. (2011) Willowood Imidacloprid Technical: Product Chemistry Series B: Product Properties: Color, Physical State, Odor, Stability to Normal and Elevated Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor Pressure. Project Number: ARC/EX/954/0 t3/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 48 p.	830.7570/Partition coefficient (n-oclanol/waler), estimation by liquid chromatography	Pass (03-Aug-2011)
48528402	Miller, R. (2011) Willowood Imidacloprid Technical: Product Chemistry Series B: Product Properties: Color, Physical State, Odor, Stability to Normal and Elevated Temperatures, Oxidalion/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor Pressure. Project Number: ARC/EX/954/013/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 48 p.	830.7840/Water solubility: Column elution method, shake flask method	Pass (03-Aug-2011)
48528402	Miller, R. (2011) Willowood Imidacloprid Technical: Product Chemistry Series B: Product Properties: Color, Physical State, Odor, Stability to Normal and Elevated Temperatures, Oxidation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor Pressure. Project Number: ARC/EX/954/013/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 48 p.	830.7860/Water solubility, generator column method	Pass (03-Aug-2011)
48528402	Miller, R. (2011) Willowood Imidacloprid Technical: Product Chemistry Series B: Product Properties: Color, Physical State, Odor, Stability to Normal and Elevated Temperatures, Oxldation/Reduction: Chemical Incompatibility, pH, UV/Visible Absorption, Melting Point/Melting Range, Density/Relative Density/Bulk Density, Dissociation Constants in Water, Partition Coefficient (n-Octanol/Water), Water Solubility, and Vapor Pressure. Project Number: ARC/EX/954/013/P/1. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 48 p.	830.7950/Vapor pressure	Pass (03-Aug-2011)
487 t 500 t	Gordon, E. (2011) Imidacloprid Technical Analysis of the Manufacturing Process Regarding the Possible Generation of N-nitrosamine Impurities. Project Number: WC/6. Unpublished study prepared by Willowood Imidacloprid, LLC. 15p.	830.1670/Discussion of formation of impurities	
48715002	AgriFor Scientific Pty Ltd. (2008) Determination of Aclive Content and Impurity Profile of Imidacloprid. Project Number: CL/001. Unpublished study prepared by AgriFor Scientific Pty, Ltd. 94p.	830.t700/Preliminary analysis	
48715002	AgriFor Scientific Pty Ltd. (2008) Determination of Active Content and Impurity Profile of Imidacloprid. Project Number: CL/001. Unpublished study prepared by AgriFor Scientific Pty, Ltd. 94p.	830.1800/Enforcement analytical method	

Decision#: (459686)

21-Day Screen Completed by Contractor

21-Day Expires on 2^{-1-12}

Jacket #<u>88544 - E</u> MRID#<u>48715 0</u>

Content Screen: Recommend to Pass/Fail

11-3 Review: Pass/Fail/NA

Overall Status: Recommend to Pass/Fail

Transfer This Jacket to:

STEPHEN SettABLE
PM-1

To the Document Center (ITRMD)

*Please transfer jacket/mini-jacket to the Product Manager Team circled below:

Minor Use Section: PM -5

Insecticide Branch: PM -10 PM-13

Herbicide Branch: PM-23 PM-25

Fungicide Branch: PM-20 PM-21 PM-22

Insect/Rodent Branch: PM-1 PM-7

*Reminder to PM – If applicable, pick-up data from the Screening Room.

Processed by RD's Completeness Check Team

(Date)

Completion of 21-Day Content Screen

PM-

EPA Reg. #(File Symbol) 88544-8

Decision # D_____

Data package delivered to you on 123/12.

Jacket/Mini-jacket will be transferred to you today. (Pick up from Document Center)

Thank you,

Registration Division's 21-Day Content Team

Memorandum

Date:	01/17/12
To:	PM , Regulatory Manager
From:	Information Services Branch, ITRMD
indication	receipt of this data submission is not an that MRIDs for the enclosed studies have ed to OPPIN.
We of from the available	expect that it will be approximately 5 days above date before the study-level data is in OPPIN. From By lake Start?
-	ntact Teresa Downs (305-5363).
This is a:	☐ fully accepted submission☐ partially accepted submission☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

January 17, 2012

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

LORI KOHLER WILLOWOOD IMIDACLOPRID, LLC PO.BOX: 640 HOCKESSIN, DE 19707-0640

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 11-JAN-12. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

DATA TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates PO Box 640 Hockessin, DE 19707

2. Regulatory Action In Support Of Which This Package Is Submitted

Application for Registration Willowood Imidacloprid Technical

3. <u>Transmitta! Date</u>

January 10, 2012

4.	List of Submitted Studies	
48715001	Vol. 1: Gordon, Elliot (2011) Imidacloprid Technical manufacturing process regarding the possible generation Study Number WC-6. 15 pages.	
48715002	Vol. 2: Skopec, Jana (2008) Determination of Active Imidacloprid. AgriFor Scientific Pty Ltd., North Ryde, 001. 94 pages.	
Company Of	ficial:	Catherine M. Byrd
	Catherine M. Byrd Name	Signature
Company Na	wagner Regulatory Associates, Inc. Agent for Willowood Imidacloprid, LLC	
Company Co	ontact: Catherine M. Byrd	(302) 635-7283
	Name	Phone

United State | onmental Profession Agency Office of Pea | Programs | Intomation Recycles and Services Division Information Services Branch



ADMINISTRATIVE NO(S).:	88544-E
PM: _/	
CHEMICAL NO.:	

The jacket for this action can be requested through the JACKETS system.

United States — Inmental Protection Agent-Office of Pea — Programs Information Resputces and Services Division Information Services Branch



ADMINIS	STRATIVE NO(S	5).:	88544-E	
	**	•		
PM: _/_				
Chemica	L No.:			

The jacket for this action can be requested through the JACKETS system.

PRIA 2 – 21 Day Content Screen Review Worksheet (EPA/OPP Use Only)

21 Da Exper Divis	rts In-Processing Signature:	3 /2 ate	Fee P	Paid: Y	es	•
EPA F	Reg. Number: 88544-E EPA Receipt Date: 1-	11-	12.			
	Items for Review			Yes	No	N/A*
1	Application Form (EPA Form 8570-1)(link to form) signed & co-including package type	mplete		X		
2	Confidential Statement of Formula all boxes completed, form sidated (EPA Form 8570-4) (Link to form)	gned, a	nd	X		No. of the Control of
L	a) All inerts (link to http://www.epa.gov/opprd001/inerts/), yes no including fragrances, approved for the proposed uses (see Footnote A) [Technical simpulities only, no incuts]		no			
Certification with Respect to Citation of Data (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			ink to	×		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)		no			
	If applicable, is there a letter of Authorization for exclusive use on		<u> </u>			
4	Formulator's Exemption Statement (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)					
	Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)					
5	a) Selective Method (Fee category experts use) yes no					
	b) Cite-All (Fee category experts use)					

c) Applicant owns all data (Fee category experts use)

6

5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to

http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	X	
8	Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)	*	*
9	If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)		X
10	Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C. a) List study (or studies) not included with application		

Comments:

studies associated with this submission passed PRN 11-3

- Regarding the application parkage, initially the efficacy guidelines were not visted in me data matrix. Registiant was contacted en 01/18/2012 through per and via email. Consectione well sent on 01/19/2012.

or our - Teannical and impusities only, no inests to review.

PRN 11-3 review - pance Jacket- passed

85/01-20-2012

MRID-487150

* N/A - Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are strongly encouraged to verify that all inert ingredients have been approved for the application's uses even if a product is currently registered by consulting the inert Web site [link to http://www.epa.gov/opprd001/inerts/lists.html] and if the inert is not approved, to obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to

http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to http://www.epa.gov/opprd001/inerts/tips.pdf] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

- 1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

- Correct the application by, for instance, correcting the inert's identity or CAS
 number, providing documentation that the inert has been approved, or
 removing the unapproved inert from the CSF or replacing it with one that is
 approved for the application's uses; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
- 3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

- Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

- B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.
- C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

_cript for Rejection Phone calls

Contact Name: Latherine M. Byrd Phone #: 302.635.7283 (p) 30 Email: Latherine @wagnerseg.com	2·766·3414(c)
First Call/Initials: Date: 01/18/2012 Time: 19:16 pm Second Call/Initi Date: 01/19/ Time: 9:30 a	2012
This is sigma shiestha, E	PA contractor.
I'm calling regarding your submission in support Temporal FPARES	ort of the product," willowed # 88544-E.
We have found the following deficiencies regar PR Notice 2011-3: Yes or No Volume/Study Title:	ding:
Volume/Study Title:	
Volume/Study Title:	
Additional volumes continued on back of	• •
Application Package: Yes or No	
Data massix missing speciticati	on regarding efficacy
Application Package: Yés) or No Data massix missing specificati uidelines.	
These deficiencies have been approved by EPA The corrections can be faxed to 703-305-5060/A	
Second Call/Email: If we do not receive the corrections by your submission, accordingly. Please direct all correspondence to the appropriate EPA Risk N	future calls and



RE: Submission in support of the product ,"Willowood ImidaclopridTechnical" (EPA Reg #88544-E)

Catherine Byrd to: Srijana Shrestha

01/19/2012 11:20 AM

2 attachments

WW Imidacloprid Technical Data Matrix EPA public rev 19JAN12.pdf

WW Imidacloprid Technical Data Matrix EPA internal rev 19JAN12.pdf

Good morning,

I have been out of the office since Tuesday. I have attached a revised data matrix. Please let me know if you need any additional information.

Thank you,

Catherine M. Byrd Regulatory Associate

Please note that our address and phone numbers have changed.

P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707 P: 302.635.7283 C: 302.766.3414

F: 302.635.7295

www.wagnerreg.com

----Original Message----

From: Srijana Shrestha [mailto:Shrestha.Srijana@epamail.epa.gov]

Sent: Wednesday, January 18, 2012 4:56 PM

To: Catherine@wagnerreg.com

Subject: Submission in support of the product, "Willowood

ImidaclopridTechnical" (EPA Reg #88544-E)

Dear Ms Byrd:

It seems like the pests mentioned in the label include termites as well. It was not clear whether "termicidal wall treatment" (in pg 2's 3rd paragraph) suggests pests as termites specifically. If so, Guideline for Efficacy data is required. Please clarify it and if it does please send the revised data matrix (EPA Form 8570-35) listing efficacy guidelines.

I have been trying to reach you through ph since this morning but your ph was not answered. I left VM as well but I haven't heard back anything from you. Feel free to call me back at 703-305-6471, if you have any questions.

Thanking you, Srijana Shrestha Macfadden, EPA Contractor 2777 S. Crystal Drive, S 4910 A Arlington, VA 22202 Ph: 703-305-6471



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

January 12, 2012

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

OPP Decision Number: D-459686

EPA File Symbol or Registration Number: 88544-E

Product Name: WILLOWOOD IMIDACLOPRID TECHNICAL

EPA Receipt Date: 11-Jan-2012 EPA Company Number: 88544

Company Name: WILLOWOOD IMIDACLOPRID, LLC

CATHERINE M. BYRD WAGNER REGULATORY ASSOCIATES WILLOWOOD IMIDACLOPRID, LLC PO Box 640 HOCKESSIN, DE 19707-0640

SUBJECT: Receipt of Application and 50% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your application, 50% small business waiver request, and cerification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R300 NEW PRODUCT; ME-TOO PRODUCT FAST TRACK;

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. The fee for this action with fee waiver is \$717. Since you paid \$2,404 towards this action, you will receive a refund in the amount of \$1,687 if your fee waiver is approved and the action is not reclassified. If your waiver request is denied, you will receive an invoice for the outstanding balance. If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

Front End Processing Staff

Information Technology & Resources Management Division

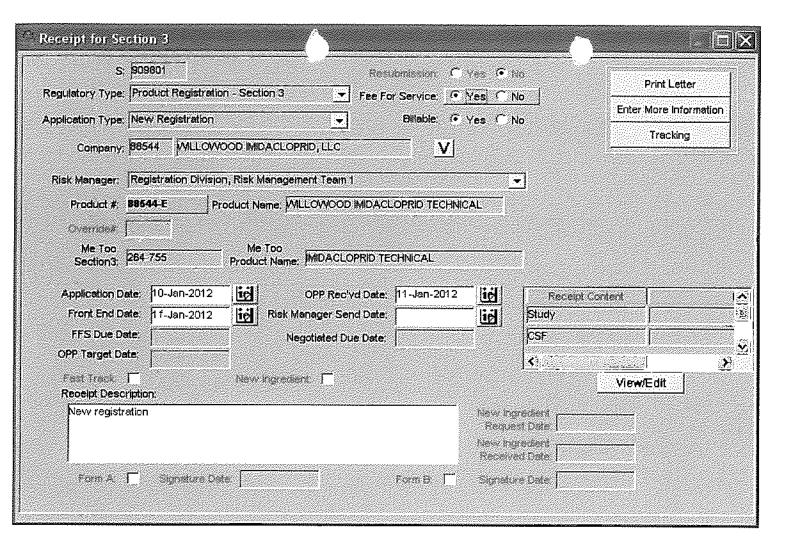
Fee for Service

{909801**ì~**

This package includes the following	for Division			
 New Registration Amendment Studies? □ Fee Waiver? volpay % Reduction: 	○ AD ○ BPPD ○ RD Risk Mgr. 1			
Receipt No. S- EPA File Symbol/Reg. No. Pin-Punch Date:	909801 88544-E 1/11/2012			
This item is NOT subject t	o FFS action.			
Action Code: Requested: R300 Granted: R300 Amount Due: \$ 143400	Parent/Child Decisions:			
Termion a Impuition only, no incuts to 10 pt Inert Cleared for Intended Use	Cleared for Intended Use Uncleared Inert in Product			
Reviewer Remarks:	Date:			

NEW APPLICATIONS

DATE: 1/11/18
FILE NUMBER: 88544-E
FEP (OPPIN ENTRY)
(Initial & date)
FILE ROOM:
(Initial & date)
SIG:
(Initial & date)
FILE ROOM:
(Initial & date)
X ASSIGN TO PM _1 (NO DATA)
JACKET TO SHELF (DATA)



Online Payment

Step 3: Confirm Payment

1 | 2 | 3

Thank you.

Your transaction has been successfully completed.

Pay.gov Tracking Information

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 255E4ANM Agency Tracking ID: 74270780151

Transaction Date and Time: 01/10/2012 17:05 EST

Payment Summary

Address Information

Account Holder Name: Brian Helnze

Billing 1600 NW Garden

Address: Valley Blvd

Billing Address 2: Ste 120

City: Roseburg

State / OR Province:

Zip / Postal 97471

Code:

Country: USA

Account Information

Card Type: Master Card

Card Number: ********6005

Decision

Number:

Registration

Number:

Company Willowood

Name: Imidacloprid LL

Company 88544 Number:

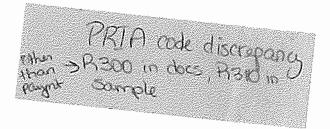
Action Code: R310

Payment Information

Payment Amount: \$2,403.50

Transaction Date 01/10/2012

and Time: 17:05 EST



Please read instructions on revers	se before completing fc			Form Appro	oved. OMF "ำ <u>. 2</u> เ		Approval expires 05-31-98
				Х	Regi: ati	on O	PP Identifier Number
	United:	States				-	
⊕EPA □	nvironmental Pr	otection A	Agency		Amendme	ent	
	Washington,	DC 20460			Other		
	Appli	cation for	Pesticide -	- Sectio	_L on [
1. Company/Product Number			2. EPA Prod		······	3. Prop	osed Classification
88544 — =			Venus Eagle	-	•	•	
Company/Product (Name)			PM#			<u> </u>	
Willowood Imidacloprid, LLCA	Willowood Imidacloprid	Technical	1			🔀 No	one Restricted
5. Name and Address of Appl	licant (Include Zip Cod	e)					RA Section 3(c)(3)
Willowood Imidacloprid, LI	С		(b)(l), my pro to:	duct is sin	nilar or identical	in compo	sition and labeling
c/o Wagner Regulatory As			EPA Reg. No	. 264-755	5		
P.O. Box 640					(a		1_
Hockessin, DE 19707	f this is a new address		Product Nam	ie: Imidac	loprid Technica	Insectica	de
Li Check i	i tilis is a new address		tion - II			·····	
Amendment - Explain be	low.	360	***************************************	printed labe	ls in response to	***************************************	
· ·			☐ Agend	cy fetter date	ed _		
Resubmission in /espons				oo" Applica			
Notification - Explain belo	OW.		Other	- Explain be	elow.		
Explanation: Use additional	page(s) if necessary. (For Section I	and Section II.)			
······································		Sec	tion - III		***************************************		
1. Material This Product Wil	i Be Packaged in:						
Child-Resistant Packaging	Unit Packaging	W	ater Soluble P	ackaging	2. Type of C		***************************************
Yes*	Yes		Yes			Metal	•
X No	X No		X No		X	Plastic	
	If "Yes"	No. per If	"Yes"	No. per	7 [] ·	Glass	
* Certification must	Unit Packaging wgt.	container Pa	ackage wgt	container		Paper	
be submitted		Ī				Other (Sp	ecify) HDPE fined bags
3. Location of Net Contents In	formation	4. Size(s) Re	etail Container	<u> </u>	5. Location of L	abel Direc	ctions
X Label Con	tainer	100 kg		, , , , , , , , , , , , , , , , , , ,	On Lab	el	
	j	v		İ		*	ompanying product
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1. Contact Point (Complete ite	ems directly below for i			be contact	ted, if necessary		
Name Cothoring M. Burd	Title	Agant for IA	المسمما استطع	alamid II			lude Area Code)
Catherine M. Byrd	Certific		illowood Imidad	dopiia, LL			nptication
I certify that the statements I hav	e made on this form and	all attachments			ind complete.		ed
I acknowledge that any knowingly both under applicable law.	y false or misleading state	ement may be p	ounishable by fine	e or imp/iso	nment or 1		(Stamped)
2. Signature		3. Title					(Stamped)
			illowood Imidad	cloprid LL	_с		
Askan W Rus	al .	A SOUL IOI VV	onoou iiniuai	overing, EL			
Cothurne M. Byra							

4. Typed Name							
Catherine M. Byrd		January 10,	2012				

January 10, 2012

Document Processing Desk (REGFEE)
ATTN: Venus Eagle, PM Team I
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

WRA

Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Dear Ms. Eagle,

Subject: Application to register a new technical grade product containing a currently registered active ingredient - "Willowood Imidaeloprid Technical"

Wagner Regulatory Associates, Inc., as agent for Willowood Imidacloprid, LLC (company number 88544), is requesting registration of the above referenced product. This product is substantially similar to the imidacloprid product (Imidacloprid Technical Insecticide) registered by Bayer CropScience LP under EPA Registration Number 264-755.

In support of this request, the following documents and studies are attached:

- · Letter from Willowood Imidacloprid, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4), 2 copies
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix (8570-35)
- Data Transmittal Document
- Preliminary Analysis data (3 copies) as outlined in the transmittal document
- Draft labeling, 3 copies and CD
- Certification with Respect to Label Integrity
- A copy of the EPA approved label for EPA Reg. No. 264-755
- · A copy of the receipt confirming payment of the required registration fees.

Willowood Imidacloprid, LLC is requesting a 50% small business waiver for this submission. Willowood has been granted this waiver for previous submissions and a copy of a prior waiver and letter with additional information is attached. Willowood has submitted payment to U.S.EPA in accordance with PRIA II Fee Table – FY09/FY10, for action category R310 - for \$2,403.50 (50% of \$4,807).

If you have any questions about this submission please contact me at catherine@wagnerreg.com or (302) 635-7283.

Respectfully submitted,

Catherine M. Byrd

Agent for Willowood Imidacloprid, LLC

Catherine M. Byrd

Enclosures

DATA TRANSMITTAL DOCUMENT

1.	Name and Address of Submitter	
	Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates PO Box 640 Hockessin, DE 19707	
2.	Regulatory Action in Support Of Which This Pac	kage Is Submitted
	Application for Registration Willowood Imidacloprid Technical	
3.	Transmittal Date	
	January 10, 2012	
4.	List of Submitted Studies	
	Vol. 1: Gordon, Elliot (2011) Imidacloprid Technica manufacturing process regarding the possible generati Study Number WC-6. 15 pages.	
**************************************	Vol. 2: Skopec, Jana (2008) Determination of Active Imidacloprid. AgriFor Scientific Pty Ltd., North Ryde 001. 94 pages.	
Company	Official:	Cotherwan Byrd
	Catherine M. Byrd Name	Signature
Company	Name: Wagner Regulatory Associates, Inc. Agent for Willowood Imidacloprid, LLC	
Company		(000) 605 7000
	Catherine M. Byrd	(302) 635-7283
	Name	Phone

June 27, 2011

To: Whom it May Concern

Re. Designation of Agent for.
Willowood Imidacloprid, LLC
1600 NW Garden Valley Blvd.
Suite 120
Roseburg, OR 97471

Dear Sir or Madem:

This letter serves as notification that Willowood Imidacloprid, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to its imidacloprid products that Willowood Imidacloprid, LLC will register with US EPA and the states. Please forward all correspondence for Willowood Imidacloprid, LLC and its products to:

Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to call me at if you have any questions.

Respectfully submitted,

Brian Heinze President/CEO

cc. WRA, Inc.

1600 NW Carden Valley Blvd., Suite 120 | Rosebirty, Oregon 97471



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The puttle reponing burden for this collection of informatic and 0.25 hours per response for reregistration and special review activities, including time for recomments regarding burden estimate or any other aspect of this collection of information, inche Strategies Division (2822f), U.S. Environmental Protection Agency, 1200 Pennsylvania Avento this address.	reading the instructions uding suggestions for t	s and completing the necessary forms. Send reducing the burden to: Director, Collection
Certification with Respect to C	Citation of Data	
Applicant's/Registrant's Name, Address, and Telephone Number Willowood Imidacloprid, LLC, P.O. Box 640, Hockessin, DE 19707		EPA Registration Nurnber/File Symbol 88544
Active Inoredient(s) and/or reoresentative test compound(s) Imidacloprid		Dale 01/10/201 t
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food/Non-food; Commercial & Residential Indoor/Outdoor; Greenhouse	'	Product Name Willowood ImidaclopridTechnical
NOTE: If your product is a 100% repackaging of another purchased EPA-registere submit this form. You must submit the Formulator's Exemption Statement (EPA Form		r all the same uses on your label, you do not need to
! arn responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies ser	nt offers of compensation (the Data Matrix form should
SECTION I: METHOD OF DATA SUPP	ORT (Check one me	ethod only)
I arm using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	under the	the selective method of support (or cite-all option selective method), and have included with this form a list of data requirements (the Data Matrix form must be
SECTION (1: GENERAL (OFFER TO PAY	1 3 3 % t. f.
[Required if using the cite-all method or when using the cite-all option under the select ! hereby offer and agree to pay compensation, to other persons, with regard to		(1.5.4.4.)
SECTION lit: CERTI	FICATION	;
! certify that this application for registration, this form for reregistration, or the application for registration, the form for reregistration, or the Data-Call-In response. In indicated in Section I, this application is supported by all data in the Agency's files that substantially similar product, or one or more of the ingredients in this product; and (2) is requirements in effect on the date of approval of this application if the application sougueses.	addition, if the cite-a t (1) concern the pro is a type of data that	all option or cite-all option under the selective method is perties or effects of this product or an identical or would be required to be submitted under the data
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	It I am the original data submitter or that I have obtained
I certify that for each study cited in support of this registration or reregistration submitter; (b) I have obtained the permission of the original data submitter to use the stompensation have expired for the study; (d) the study is in the public literature; or (e) offered (f) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c) amount and terms of compensation, if any, to be paid for the use of the study.	study in support of th I have notified in wri	is application; (c) all periods of eligibility for ting the company that submitted the study and have
I certify that in all instances where an offer of compensation is required, cop accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be evidence to the Agency upon request, I understand that the Agency may initiate action FtFRA.	e submitted to the A	agency upon request. Should I fail to produce such
t certify that the statements t have made on this form and all attachm knowingty false or misteading statement may be punishable by fine or imprisor		
Signature Catherine MByM	Date 1/10/2012	Typed or Printed Name and Title Catherine M. Byrd, Agent

EPA Form 8570-34 (t2-2003) Electronic and Paper versions available. Submit only Paper version.



100% identical (repack): YES or NO (circle one)

{If **yes**, it's a 100% repack - then product chemistry, acute toxicity and efficacy data are <u>not</u> required}

Data on Group and A and B must be submitted - Group A and B can \underline{not} be cited.

C		Data submi	ted
Guideline Group A: Product Chemistry Data No. Study Title		Yes	No
830.1550	Product Identity & Composition	/	
830.1600	Description of materials used to produce the product		
830.1650	Description of formulation process		
830.1670	Discussion on the formation of impurities		
830.1700	Preliminary analysis	\	
830.1750	Certified limits (158.345)		
830.1800	Enforcement analytical method		

Guideline	Group B: Product Chemistry Data	Data submitted
No.	Study Title	Yes No
830.6302	Color	
830.6303	Physical State	
830.6304	Odor	
830.6314	Oxidation/Reduction (Chemical incompatibility)	
830.6315	Flammability	
830.6316	Explodability	
830.6317	Storage stability	
830.6319	Miscibility	1
830.6320	Corrosion Characteristics	
830.6321	Dielectric Breakdown voltage	
830.7000	На	
830.7100	Viscosity	
830.7300	Density	

R 300 and 301

New products must provide a bridging rationale document. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline	Acute toxicity (6 pack)	Cited		
No.			No	
870.1100	Acute Oral (LD50)			
870.1200	Acute Dermal (LD50)			
870.1300	Acute Inhalation (LC50)			
870.2400 `	Acute Eye Irritation			
870.2500	Acute Dermal Irritation			
870.2600	Dermal Sensitization			

Efficacy – which guideline depends on the proposed label use and they must cite the data to be used for the bridging rationale.

Guideline		Cite	ed	No.
No.	Efficacy Study Titles	Yes	No	Comments
810.3100	Soil Treatments for Imported Fire Ants		X	
810.3200	Livestock, Poultry, Fur and Wool-Bearing Animal Treatments		×	
810.3300	Treatments to Control Pests of Humans and Pets		X	
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments		X	
810.3500	Premises Treatments			
810.3600	Structural Treatments	1		
810.3800	Methods for Efficacy Testing of Termite Baits		X	



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WASHINGTON, D.C. 20460

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DATA MATRIX					
Date: January 19, 2012	W	EPA Reg No./ File Symbol: 88544	Page I of 8		
Applicant's/Registrant's Name and Address:	Willowood Intidacloprid, LLC c/o Wagner Regulatory Associates Inc.	Product:			
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical			
Ingredient: Imidacloprid					

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1650, 830.1670,	Product identity, composition/Description of nuaterials Used to Produce the Product/Description of Formulation Process/Discussion of Formation of Impurities	48528401	Willowood Iniidaeloprid, LLC	Оwп	
830.1700	Preliminary Analysis		Willowood Imidaeloprid, LLC	Own	
830.1750	Certification of Linuits		Willowood Imidacloprid, LLC	Own	1 .
830.1800	Enforcement Analytical Method		Willowood Imidaeloprid, LLC	Own	
830.6302	Color	48528402	Willowood Imidacloprid, LLC	Own	
830.6303	Physical State	48528402	Willowood Imidaeloprid, LLC	Own	
830.6304	Odor	48528402	Willowood Imidacloprid, LLC	Own	
830.6313	Stability to Nonnal & Elevated Temperatures	48528402	Willowood Imidacloprid, LLC	Own	
830.6314	Oxidation/Reduction	48528402	Willowood Imidaeloprid, LLC	Own	
830.6315	Flammability	48528402	Willowood Imidaeloprid, LLC	Own	
830.6316	Explodability	48528402	Willowood Imidaeloprid, LLC	Own	
830.6317	Storage Stability		Willowood Imidaeloprid, LLC	Own	
830.6319	Miscibility	48528402	Willowood Imidacloprid, LLC	Own	
830.6320	Corrosion Characteristics		Willowood Imidacloprid, LLC	Own	
830.6321	Dielectric Breakdown Voltage	48528402	Willowood Imidaeloprid, LLC	Own	
830.7000	pH	48528402	Willowood Imidacloprid, LLC	Own	
830.7050	UV/Visible Light Absorption	48528402	Willowood Imidaeloprid, LLC	Own	
830.7100	Viscosity	48528402	Willowood Imidacloprid, LLC	Own	

Signature	Name and Title	Date
	Catherine M. Byrd	Јапиагу 19,
Catherine M. Byrd	Agent for Willowood linidacloprid, LLC	2012
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DATA MATRIX					
Date: January 19, 2012	Violation	EPA Reg No./ File Symbol: 88544	Page 2 of 8		
Applicant's/Registrant's Name and Address:	Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates Inc.	Product:			
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical			
Ingredient: Imídacloprid					

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7200	Melting Point	48528402	Willowood Imidacloprid, LLC	Own	
830.7220	Boiling Point	48528402	Willowood Imidacloprid, LLC	Own	
830.7300	Relative Density	48528402	Willowood Imidacloprid, LLC	Own	
830.7370	Dissocation Constants in Water	48528402	Willowood Imidacloprid, LLC	Own	
830.7520	Particle Size, Fiber Length, and Diameter Distribution	48528404	Willowood Imidacloprid, LLC	Own	
830.7550	Octanol/Water Partition Coefficient	48528402	Willowood Imidacloprid, LLC	Own	
830.7840	Solubility in Organic Solvents	48528402	Willowood Imidacloprid, LLC	Own	
830.7860	Water Solubility	48528402	Willowood Imidacloprid, LLC	Own	
830.7950	Vapor Pressure	48528402	Willowood Imidacloprid, LLC	Own	
870.1100, 870.1200, 870.1300, 870.2400, 870.2500, 870.2600	Acute Oral Toxicity, Acute Dennal Toxicity, Acute Inhalation Toxicity, Primary Eye Irritation, Primary Dermal Irritation, Skin Sensitization	Cite All	Syngenta Crop Protection, LLC Greensboro, NC	Pay	
Generic Data	Generic Data	A100	Nufarm Americas Inc. Burr Ridge, IL		1
810.3500	Prentises Treatments		Bayer CropScience LP Research Triangle Park, NC		
810.3600	Structural Treatments		FMC Corp. Agricultural Products Group Philadelphia, PA Chemtura Corporation Middlebury, CT		

Signature	Name and Title	Date
	Catherine M. Byrd	January 19,
Cathurus M. Byrd	Agent for Willowood Intidacloprid, LLC	2012
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DATA MATRIX					
Date: January 19, 2012		EPA Reg No./ File Symbol: 88544	Page 3 of 8		
Applicant's/Registrant's Name and Address:	Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates Inc.	Product:	<u> </u>		
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical			
Ingredient: Imidacloprid	Tiockessin, DE 17707				

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	11.0		Bayer Environmental Science		
			Research Triangle Park, NC		
			The Scotts Company		
			Marysville, OH		
			Cleary Chemicals, LLC		
			Dayton, NJ		
			PBI/Gordon Corp.	7	
			Kansas City, MO		-
			Osmose Inc.	7	
			Buffalo, NY		
			Bayer Corp.	1	
			Kansas City, MO		
			Helena Chemical Co.	7	
			Memphis, TN		
			Gustafson LLC	1	
			Dallas, TX		
			J. J. Mauget Co.	7	
			Woodbridge, VA		
			The Andersons Lawn Fertilizer Division	1	
			Maumee, OH		
			Chemical Specialties Inc.		
			Harrisburg, NC		SAPERATE STATE OF THE SAPERATE STATE STATE OF THE SAPERATE STA

Signature	Name and Title	Date
	Catherine M. Byrd	January 19,
Cothware M. Byrd	Agent for Willowood linidaeloprid, LLC	2012
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	IX	
	EPA Reg No./ File Symbol: 88544	Page 4 of 8
Willowood huidacloprid, LLC c/o Wagner Regulatory Associates Inc.	Product:	
P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical	
	c/o Wagner Regulatory Associates Inc. P.O. Box 640	Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Product: Willowood Imidacloprid Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
***************************************			Bayer Healthcare LLC		
			Shawnec Mission, KS	_]	
			Mitsui Chemicals, Inc.		
			Valdosta, GA		
			Loveland Products, Inc.		
			Greeley, CO		
			Nufarm Limited		
			Morrisville, NC		
			Lanxess Corporation		
			Pittsburgh, PA		
			Albangh Inc.		
			Ankeny, IA		
			Acroxon Inc.		
			Fort Lcc, NJ		
			Control Solutions, Inc.		
		4	Pasadena, TX	i	
			Nufarm Americas Inc.		
			Morrisville, NC		
			Makhteshim-Agan of North America		
			Inc.; Raleigh, NC		
			Spray Drift Task Force	\neg	
			Washington, DC	1	

		Direction
Signature	Name and Title	Date
_	Catherine M. Byrd	January 19,
Cothway M. Byrd	Agent for Willowood Imidacloprid, LLC	2012
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Data: January 19, 2012 Applicant's/Registrant's Name and Address: Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Ingredient: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Cheminova, Inc.		·····
			Arlington, VA		
			Mycogen Seeds	***	
		****	Indianapolis, IN		
			Arbor Systems, LLC		
			Greeley, CO		
			Pet Logic LLC		
			Omaha, NE		
			Repar Corp.		
			Washington, DC	***	
			United Phosphorus, Inc.		
			King of Prussia, PA		
			Sulphur Mills, Ltd.		
			Clovis, CA		
		****	Nufarm, Inc.		
			Morrisville, NC	ļ	
			ISK Biosciences Corporation	<u> </u>	
			Concord, OH	****	
			Outdoor Residential Exposure Task		
			Force; Washington, DC		
		######################################	Agricultural Reentry Task Force	\neg	
			Washington, DC		

Signature	Name and Title	Date
	Catherine M. Byrd	January 19,
Mallania W Rurd	Agent for Willowood Imidacloprid, LLC	2012
Cotherine M Byrd		ì



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	DATA MATR	IX	
Date: January 19, 2012		EPA Reg No./ File Symbol: 88544	Page 6 of 8
Applicant's/Registrant's Name and Address:	Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates Inc.	Product:	
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidaeloprid Technical	

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Bayer Advanced		
			Research Triangle Park, NC	_	
			Agrisel USA, Inc.		
			Brookfield, CT		
			Scimetrics, Ltd. Corporation		
		***************************************	Wellington, CO		
	And and and and and and and and and and a		Zelam Ltd.		
			Lake Oswego, OR	_	
			Rockwell Laboratorics, Ltd.		
			North Kansas City, MO	***	
			Sapstain Industry Group (SIG)		
		***************************************	Titusville, NJ		
			Univar USA Inc.		
			Brookfield, CT		
			Innovative Pest Control Products		
			Boca Raton, FL	_	
			FIFRA Endangered Species Task Force		
		re and a second	Washington, DC	-	
			ArborJet		
			Silver Spring, MD		
			Rainbow Treecare Scientific		
			Advancement; Minnetonka, MN		

Signature	Name and Title	Date
	Catherine M. Byrd	January 19,
Cothware M. By of	Agent for Willowood Imidaeloprid, LLC	2012
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DATA MATRIX Date: January 19, 2012 Applicant's/Registrant's Name and Address: Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Ingredient: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Residential Exposure Joint Venture		
			Washington, DC		
			Agricultural Handlers Exposure Task		
			Force; Macon, MO		
			Arch Treatment Technologies, Inc.		
			Atlanta, GA		
			Gro-Pro, LLC		
			Gig Harbor, WA		
			Rotam Limited		
			Sarasota, FL		
			Etigra LLC		
			Gig Harbor, WA		
			Sharda Worldwide Exports Pvt. Ltd.		
			Hockessin, DE		*****
		# H H H H H H H H H H H H H H H H H H H	Ensystex III, Inc.		
		} 	Gig Harbor, WA	_	
			Rotam Agrochemical Company Limited		
			Sarasota, FL		
			Direct Ag Source, LLC		
			Brookfield, CT		
			Sharda USA LLC		
			Hockessin, DE		

Signature	Name and Title	Date
	Catherine M. Byrd	January 19,
Cathway M Byrd	Agent for Willowood Imidacloprid, LLC	2012
Continue in Equa		



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Applicant's/Registrant's Name and Address:	Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates Inc.	Product:	Annana -		
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical			

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Celsius Property B.V., Antsterdant (NL)		
		***************************************	Raleigh, NC		
			Aintide, LLC	1	
			Irvine, CA		
			Ensystex IV, Inc.		
		ļ	Gig Harbor, WA		
		1	Viance, LLC	1	
			Charlotte, NC		
			Dalian Chemphy Chemicals Co. Ltd.	1	
			Washington, DC		
			Generic Endangered Species Task Force	1	
			Gig Harbor, WA		
			Abamax Chemical LLC	1	
			Hockessin, DE		
			Mclaughlin Gormley King Co	1	
			Minneapolis, MN		
			Arcana LLC	1	
		Minimum	Johnstown, CO		
			Willowood LLC	1	
			Gig Harbor, WA		

Footnotes: 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4

Signature	Nante and Title	Date
	Catherine M. Byrd	January 19,
Catherine M Byrd	Agent for Willowood Imidacloprid, LLC	2012
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Applicant's/Registrant's Name and Address:	Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates Inc.	Product:	
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical	

Guldeline Reference Number	Guldeline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC		. 7			1
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	1
1000			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
		10000	Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
Maria de Maria de Caldada			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
Section 1			Willowood Imidacloprid, LLC	Own	

Signature	Name and Title	Date
Cotherine M Byrd	Catherine M. Byrd Agent for Willowood Imidacloprid, LLC	January 19, 2012



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	DATA MATR	IX	
Date: January 19, 2012	100	EPA Reg No./ File Symbol: 88544	Page 2 of 8
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	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical	

Guldeline Reference Number	Guldeline Study Name	MRID Number	Submitter	Status	Note
			Willowood Imidacloprid, LLC	Own	****
(1984)			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
			Willowood Imidacloprid, LLC	Own	
Carrier Baseline London		166 a section 200 and 200 as	Willowood Imidacloprid, LLC	Own	
			Willowood Imidaeloprid, LLC	Own	
0.000			Syngenta Crop Protection, LLC	Pay	
			Greensboro, NC		
			Nufarm Americas Inc.		
			Burr Ridge, IL		
			Bayer CropScience LP		
			Research Triangle Park, NC		
			FMC Corp. Agricultural Products Group		
	100,000	\$45.00 E	Philadelphia, PA		
			Chemtura Corporation		
			Middlebury, CT		
			Bayer Environmental Science		
		1000	Research Triangle Park, NC		
			The Scotts Company		
			Marysville, OH		
			Cleary Chemicals, LLC		
			Dayton, NJ		

Signature	Nanie and Title	Date
	Catherine M. Byrd	January 19,
Cathurum M Byrd	Agent for Willowood Imidacloprid, LLC	2012



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	DATA MATRI	IX	
Date: January 19, 2012		EPA Reg No./ File Symbol: 88544	Page 3 of 8
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	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical	

Guldeline Reference Number	Guldeline Study Name	MRID Number	Submitter	Status	Note
			PBI/Gordon Corp.		
			Kansas City, MO	1	
			Osmose Inc.		
			Buffalo, NY		
Control of the second			Bayer Corp.		
			Kansas City, MO		
			Helena Chemical Co.		
			Memphis, TN	1	
			Gustafson LLC		
			Dallas, TX	1	
			J. J. Mauget Co.		
		*	Woodbridge, VA	į	
100			The Andersons Lawn Fertilizer Division		
			Maumee, OH	1	
			Chemical Specialties Inc.		
			Harrisburg, NC		
			Bayer Healthcare LLC		
200			Shawnee Mission, KS		
			Mitsui Chemicals, Inc.		
			Valdosta, GA		
			Loyeland Products, Inc.		
E. C.			Greeley, CO		

Signature	Name and Title	Date
	Catherine M. Byrd	January 19,
Cothurum n Byrd	Agent for Willowood Imidacloprid, LLC	2012
(minute)		



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	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical	

Guldeline Reference Number	Guldeline Study Name	MRID Number	Submitter	Status	Note
		•	Nufarm Limited		
			Morrisville, NC		
			Lanxess Corporation		
POST CONTROL CONTROL			Pittsburgh, PA		
			Albaugh Inc.		
			Ankeny, IA		
			Aeroxon Inc.	1	
			Fort Lee, NJ		
			Control Solutions, Inc.		i
			Pasadena, TX		
			Nufarm Americas Inc.		
			Morrisville, NC		
			Makhteshim-Agan of North America		l-
			Inc.; Raleigh, NC	_	
			Spray Drift Task Force		
			Washington, DC	4	
			Cheminova, Inc.		
Marie Control Control			Arlington, VA	_	
			Mycogen Seeds		
			Indianapolis, IN		
			Arbor Systems, LLC		
			Greeley, CO	┙	

Signature	Name and Title	Date
Catherine M. Byrd	Catherine M. Byrd Agent for Willowood Imidacloprid, LLC	January 19, 2012



WASHINGTON, D.C. 20460

DATA MATRIX					
	EPA Reg No./ File Symbol: 88544	Page 5 of 8			
Willowood linidacloprid, LLC	Product:				
P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical				
	Willowood linidacloprid, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640	Willowood luidacloprid, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 EPA Reg No./ File Symbol: 88544 Product: Willowood Imidacloprid Technical			

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Pet Logic LLC	-	
			Oınaha, NE		
			Repar Corp.]	
			Washington, DC	_]	
			United Phosphorus, Inc.		
			King of Prussia, PA		
E000			Sulphur Mills, Ltd.		
			Clovis, CA		
Market Control			Nufarm, Inc.		
			Morrisville, NC		
attend the control of			ISK Biosciences Corporation	1	
			Concord, OH		
			Outdoor Residential Exposure Task		j i
			Force; Washington, DC	_	
\$25g			Agricultural Reentry Task Force		
			Washington, DC	_	
			Bayer Advanced		
			Research Triangle Park, NC		
			Agrisel USA, Inc.	1	
			Brookfield, CT		
			Scimetrics, Ltd. Corporation		
			Wellington, CO		

Signature	Name and Title	Date
	Catberine M. Byrd	January 19,
Cothwar R Byrd	Agent for Willowood Imidacloprid, LLC	2012
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	DATA MATR	X	
Date: January 19, 2012		EPA Reg No / File Symbol: 88544	Page 6 of 8
Applicant's/Registrant's Name and Address:	Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates Inc.	Product:	
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical	

Guideline Reference Number	Guldeline Study Name	MRID Number	Submitter	Status	Note
			Zelam Ltd.		
			Lake Oswego, OR		
	Charles and Charles		Rockwell Laboratories, Ltd.		
			North Kansas City, MO	_	
	200	Additional Control of the Control of	Sapstain Industry Group (SIG)		
			Titusville, NJ	_	
			Univar USA Inc.		1
			Brookfield, CT	1	
			Innovative Pest Control Products		1
			Boca Raton, FL	1	
			FIFRA Endangered Species Task Force		
			Washington, DC	_	
			ArborJet		
			Silver Spring, MD	1	
			Rainbow Treecare Scientific	İ	Į
			Advancement; Minnetonka, MN	_	
			Residential Exposure Joint Venture		
			Washington, DC	_	
			Agricultural Handlers Exposure Task		
			Force; Macon, MO		
10000000			Arch Treatment Technologies, Inc.		
			Atlanta, GA		

Signature	Name and Title	Date
	Catherine M. Byrd	January 19,
Cathurum M Byrd	Agent for Willowood Imidacloprid, LLC	2012
Chiampor Eque		ł



WASHINGTON, D.C. 20460

DATA MATRIX					
Date: January 19, 2012		EPA Reg No./ File Symbol; 88544	Page 7 of 8		
Applicant's/Registrant's Name and Address:	Willowood Imidacloprid, LLC c/o Wagner Regulatory Associates Inc.	Product:			
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidacloprid Technical			
Ingredient: Imidacloprid					

Guideline Reference Number	Guldeline Study Name	MR1D Number	Submitter	Status	Note
			Gro-Pro, LLC		··-
			Gig Harbor, WA	_	
			Rotam Limited		1
			Sarasota, FL		
			Etigra LLC		
			Gig Harbor, WA	_	
			Sharda Worldwide Exports Pvt. Ltd.	1	1
			Hockessin, DE		
			Ensystex III, Inc.		
			Gig Harbor, WA	4	
1000			Rotam Agrochemical Company Limited		
			Sarasota, FL	4	
			Direct Ag Source, LLC		
			Brookfield, CT	4	
			Sharda USA LLC		
			Hockessin, DE	_	
			Celsius Property B.V., Amsterdam (NL)	1	1
			Raleigh, NC	4	
100			Amtide, LLC		
100			Irvine, CA		
			Ensystex IV, Inc.		
			Gig Harbor, WA	_}	

Signature	Name and Title	Date
_	Catherine M. Byrd	January 19,
Cothour M Byrd	Agent for Willowood Imidacloprid, LLC	2012
Chiambo 1 6/10		



WASHINGTON, D.C. 20460

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	DATA MATR	IX	
Date: January 19, 2012	-	EPA Reg No./ File Symbol: 88544	Page 8 of 8
Applicant's/Registrant's Name and Address:	Willowood Imidaeloprid, LLC c/o Wagner Regulatory Associates Inc.	Product:	
	P.O. Box 640 Hockessin, DE 19707	Willowood Imidaeloprid Technical	

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
II.			Viance, LLC		
			Charlotte, NC]	
			Dalian Chemphy Chemicals Co. Ltd.		
		11	Washington, DC		
		2,642,000 (2,000,000,000,000,000,000,000,000,000,0	Generic Endangered Species Task Force		
			Gig Harbor, WA		
			Abamax Chemical LLC		
			Hockessin, DE	_	
			Melaughlin Gormley King Co		
			Minneapolis, MN		
			Arcana LLC		
			Johnstown, CO	_	
		The state of the s	Willowood LLC		
			Gig Harbor, WA		

Footnotes: 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4

Signature	Name and Title	Date
	Catherine M. Byrd	January 19,
Cothwar M. Byrd	Agent for Willowood Imidacloprid, LLC	2012
(manufacture)		

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL				
EPA Registration #	Date Submitted to EPA	Electronic file name		
XXXXX-R	July 5, 2011	XXXXX.XXXXX.20110705.V1.pdf		

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature

January 10, 2012

Date

Catherine M. Byrd Name (typed)

Catherine M Byrd

Agent for Willowood Imidacloprid, LLC Title

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then you will find e-label in

Electronic Label Library

If the e-labet is not found in the ELL then it was probably not named correctly and could not be entered into the ELL. However, the fite can be retrieved from the CD which is retained by the Front End.

or

If e-label was submitted via

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then you will find e-label in

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See overview of processing e-labels on other side of this sheet.

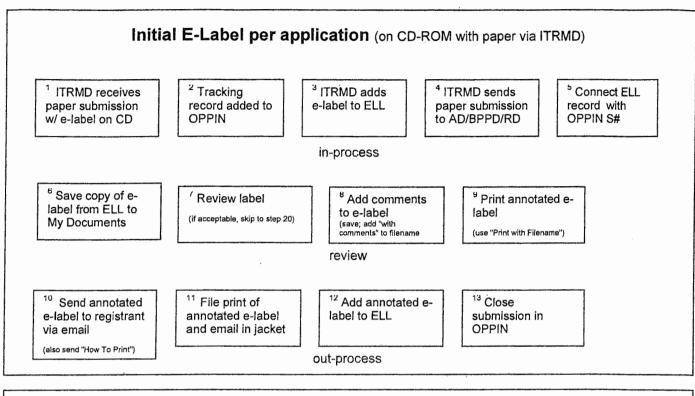
If you have any questions on e-labels, please contact one of your division e-label experts:

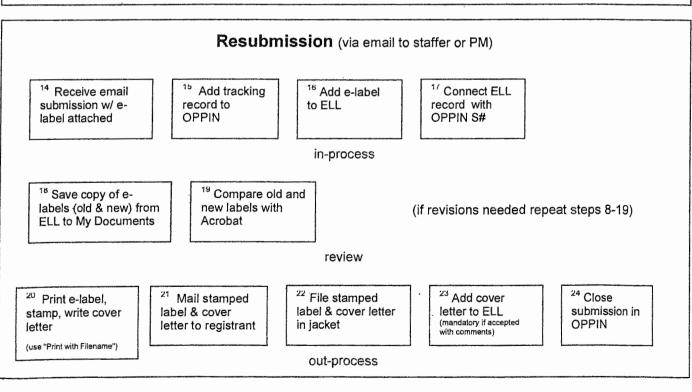
AD	Willie Abney	308-1689
	Renae Whitaker	308-7003
	Tracy Lantz	308-6415
BPPD		
RD	Tom Harris	308-9423

PROCESSING ELECTRONIC LABELS

(rev. 1/5/09, tch)

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process - big picture

- 1- create OPPIN tracking
- 2- put label in ELL; link to S#
- 3- save ELL label to MyDocuments
- 4- compare / comment
- 5- outprocess

techniques to know

- filename for e-labels
- "print with filename"
- compare / comment
- printing with comments

